# Before the FEDERAL COMMUNICATIONS COMMISSION Washington D.C. 20554

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In the Matter of	)
Unbundled Access to Network Elements	)
	) WC Docket No. 04-313
Review of the Section 251 Unbundling	)
Obligations of Incumbent Local	) CC Docket No. 01-338
Exchange Carriers	
-	)
	)

### **DECLARATION OF M. JOSEPH STITH**

- 1. My name is M. Joseph Stith. I am an analyst at AT&T. My responsibilities include analysis of ILEC Special Access. I obtained a Ph.D. in Mathematical Statistics from the University of Missouri in 1978.
- 2. In support of AT&T's Comments in this proceeding, I previously submitted a sworn Declaration, with supporting data detailing the rates for each RBOC, showing that (i) the Bells' tariffed rates are, on average, significantly above their rates for equivalent UNEs, with tariffed rates exceeding UNE rates by well over 100% in many cases; and (ii) the Bells' tariffed pricing flexibility rates are equal to or higher than their price cap rates in virtually every instance. AT&T Comments, Attachment H, Declaration of M. Joseph Stith.
- 3. In its Comments, SBC claims that, "In response to competition, SBC has continued to lower its rates for special access services. ... Between 2001 and August 2004, the rate for DS-1s in SBC's territory dropped each year for a cumulative decrease of 11 percent." (SBC Comments, Attachment D, Declaration of Parley C. Castro, ¶ 14.) Similarly, Verizon claims that its "prices for DS-1 services alone have fallen nine

percent since 2001," and that, "Overall, high-capacity prices have fallen by almost 12 percent in nominal terms between 2001 and 2003. (Verizon Comments, Attachment 15, Declaration of Claire Beth Nogay, ¶ 37.)

- 4. I submit this declaration to show that these claims are misleading for two prominent reasons. First, they are not "apples-to-apples" comparisons -i.e., they do not compare circuits at the beginning of the period to an exact duplicate at the end. By exact duplicate, I mean exact duplicate by speed, transport mileage, location (zone, price cap versus pricing flexibility area) and any contracted plan to which the customer subscribes. Second, although the Bells' rates did decrease, it can be shown that little of this decrease can be attributed to anything other than changes caused by regulation.
- 5. In this declaration I provide two sets of rate analysis charts illustrating the RBOC rate changes for DS1 and DS3 services from May 1, 2001 to August 31, 2004. These analyses clearly demonstrate that rate decreases came predominantly from the rates that are still regulated under price caps. These analyses further demonstrate that rates under pricing flexibility have seen few decreases. These decreases come nowhere near the comparable decreases of the price cap rates. I also include a chart showing that little if any of the price cap rate reductions can be attributed to anything outside price cap regulation.
- 6. Specifically, I have prepared a set of charts entitled "Comparison of Costs (10-mile Standalone Circuit) Rates in Effect on August 31, 2004 to Rates in Effect on May 1, 2001," which provides a comparison of each Bell company's current tariffed interstate special access rates subject to price caps and those subject to pricing flexibility, to the same rates effective May 1, 2001, when the rates subject to pricing flexibility either

did not exist, or were equal to the price cap rates. The charts are prepared only for DS1 and DS3 services, the services that represent the largest expenses of special access purchases by AT&T and the industry. As in my previous submission, I have prepared a similar set of charts for a zero-mile circuit, entitled "Comparison of Costs (0-mile Standalone Circuit) Rates in Effect on August 31, 2004 to Rates in Effect on May 1, 2001," which make this same comparison for a zero mile circuit.

- 7. For both the ten mile and zero mile comparisons, I have also prepared a one page "Comparison Summary," based on the detailed data in the company-by-company rate charts, for the DS1 and DS3 speeds. The Comparison Summary provides the maximum and median percentage differences for these speeds for each company. The median is used as a measure of the average percentage difference. For each company, columns 1 and 2 show the percentage by which current price cap rates exceed rates effective in May 2001, for month-to-month and 3-year optional payment plan (OPP) offerings. Column 3 is a simple average of the price cap month-to-month and OPP percentage differences and is an approximation of the price increases borne by the many carriers that purchase special access at both month-to-month and OPP rates. Columns 4 and 5 show the percentage by which current pricing flexibility rates exceed rates effective in May 2001, for month-to-month and 3-Year OPP offerings. Column 6 is a simple average of the pricing flexibility month-to-month and OPP percentage differences.
- 8. For the detailed, company-specific rate charts, I computed the rates as follows. All rates in one comparison are for a ten-mile stand-alone circuit, and for the other comparison, a zero-mile circuit. In other words, each rate is for two channel terminations, a fixed mileage charge for transport, and per-mile charge for transport

multiplied by ten (the mileage charges, both fixed and per-mile are included for the 10-mile comparison only). In any instance in which the ILEC has zoned rates, I used the Zone 1 rate. Rates specified "Pre-Price Flex" were effective May 1, 2001. All other rates are as of August 31, 2004.

- 9. "ILEC Tariff" indicates ILEC's tariffed month-to-month rate for a tenmile and zero-mile standalone circuit, respectively. Month-to-month rates are given for Pre-Price Flex, Price Cap and Pricing Flexibility, indicating common rates effective May 2001, rates under price cap regulation effective August 31, 2004, and rates under pricing flexibility effective August 31, 2004, respectively. The ILEC Tariff rates are in columns 1, 3 and 5 for Pre-Price Flex, Price Cap and Pricing Flexibility.
- 10. "ILEC OPP" is the ILEC's tariffed rate for a ten-mile and zero-mile standalone circuit, respectively, provided in its optional payment plan ("OPP"). Again, OPP rates are given for Pre-Price Flex, Price Cap and Pricing Flexibility. All OPP rates are for three-year plans, except where that term is not available, in which case the highest year plan below three years was used. The ILEC OPP rates are in columns 2, 4 and 6 for Pre-Price Flex, Price Cap and Pricing Flexibility.
- 11. "Mo-to-Mo % Difference Price Cap to Pre-Pr Fl" is the percentage difference between the current price capped month-to-month rate and the pre-pricing flexibility month-to-month rate effective May 1, 2001 (*i.e.*, the percentage difference between the rates in columns 1 and 3).

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<sup>&</sup>lt;sup>1</sup> "ILEC OPP" does not include payment plans requiring the purchaser to commit either to an expense level or to an expense growth.

- 12. "OPP % Difference Price Cap to Pre-Pr Fl" is the percentage difference between the price capped OPP rate and the pre-pricing flexibility OPP rate (*i.e.*, the percentage difference between the rates in columns 2 and 4).
- 13. "Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl" is the percentage difference between the current pricing flexibility month-to-month rate and the pre-pricing flexibility month-to-month rate effective May 1, 2001 (*i.e.*, the percentage difference between the rates in columns 1 and 5).
- 14. "OPP % Difference Pricing Flex to Pre-Pr Fl" is the percentage difference between the pricing flexibility OPP rate and the pre-pricing flexibility OPP rate (*i.e.*, the percentage difference between the rates in columns 2 and 6).
- 15. The final chart provided is entitled "2001 2004 Annual Filings, RBOC Price Cap % Below Maximum Allowable Level." Price cap regulation provides a measure to determine if and how much an ILEC's rates are below their allowable maximum. This chart gives the percentage that price cap rates are below their allowable maximum. Stated another way, it gives the percentage by which the ILECs set their rates below the maximum rate levels that are allowed by the Commission's price cap regulations for the special access services. (I discuss this chart further in paragraph 19).
- 16. With respect to the Bells' rates under price caps, the data demonstrate, for a 10-mile circuit, that the Bells' tariffed rates for DS1 and DS3 subject to price cap regulation are, on average, below the equivalent rates from 2001. In fact, they are lower for all the Bells over both month-to-month and OPP offerings except for BellSouth's DS1 Month-to-Month rates. For example, the Comparison Summary shows that for DS1 OPP rates which represent the single largest dollar volume and expense for AT&T and the

industry – Qwest's price cap rates are on average more than 15% lower than the 2001 rates. BellSouth's are 13% lower, Verizon-South's are 11% lower, and Verizon-North's and SBC's are 10% lower.

- the current pricing flexibility rates do not show the decreases seen in the price cap rates. For a 10-mile circuit the Bells' tariffed rates for DS1 and DS3 subject to pricing flexibility are, on average, equal to or greater than the equivalent rates from 2001. In fact, these rates have increased for all the Bells for month-to-month offerings. For OPPs, only Verizon-South's DS3 rates have decreased from their May 2001 levels (and then only by one-sixth of the price decreases Verizon-South made for price-capped special access rates). BellSouth and SBC OPPs have kept their pricing flexibility rates exactly at the 2001 level which is tantamount to a price *increase* in light of the declining costs of special access service over this time period. Qwest has raised its DS1 OPPs by 13% and Verizon-North has increased them by 18%. Qwests' DS3 OPP rates have increased 42% over their 2001 level. Results for month-to-month rates show even larger increases. From this analysis, it is evident that the Bells' rate decreases from 2001 to 2004 have come almost solely from price cap rates.
- 18. The results for a zero-mile circuit are similar. Comparisons of current price cap rates with May 2001 rates show decreases on average, except in BellSouth's month-to-month DS1 rates. The comparison of pricing flexibility rates to May 2001 rates shows increases in all month-to-month rates for all companies except SBC where the rates remain unchanged. OPP rates do not change or they increase for all Bells except Verizon-South.

19. After observing that the rate decreases have come almost exclusively from the price cap rates, I examined the data in the last chart to see how much of the rate decreases were beyond the level required by the Commission's price cap regulations. Rates subject to price cap regulation would necessarily have been reduced during the years 2001 through 2003, by operation of the price cap mechanism alone. The reason for these decreases is that price cap annual changes are determined by an econometric equation whose major component is comparing an inflation index against a productivity factor of -6.5%. Since the inflation index, the Gross Domestic Product Price Index, was below 6.5% in all years from 2001 through 2003, price cap regulation resulted in rate decreases for those years. The exact amount that price cap ILECs had to decrease their rates from 2001 through 2003 depended on other, company specific, factors called exogenous costs. For the year 2004, the productivity factor was set equal to the inflation index causing very minor rate changes in that year. Each year during the annual filing, the Bells set their price cap rates for the new regulatory year. At that time, they have the opportunity to price below the regulated maximum rates. The last chart, "2001 – 2004 Annual Filings, RBOC Price Cap % Below Maximum Allowable Level" shows the percentage that the RBOCs proposed revenue from each annual filing is below the allowable cap. Stated another way, this is the percentage by which the rates filed by the RBOCs were below the maximum rates allowed under the price cap rules. Looking at this chart, it is seen that the RBOCs kept prices at, or a trivial fraction below, the price cap index. The "largest" rate decreases, beyond those mandated by the Commission's rules, were filed by Qwest. Qwest lowered its rates only by an additional ½ of 1% beyond the level required by price cap regulation. (The data do not indicate why Qwest

did not price exactly at its cap). Qwest's difference has remained relatively unchanged since 2001. For the SBC companies, Ameritech priced below cap by 1/10 of 1% in 2003. In 2004, both SBC and Verizon-East filed at the maximum level allowed by price cap regulation. This chart thus shows that the amount of rate decreases that the Bells filed below the levels required by price cap regulation were negligible.

20. This concludes my Declaration.

I, M. Joseph Stith, declare under penalty of perjury that the foregoing is true and correct.

/s/ M. Joseph Stith
M. Joseph Stith

Executed on October 18, 2004.

# Comparison Summary 3-yr, 10-mile circuits Rates used were effective on August 31, 2004 Price Cap and Pricing Flexibility compared to Common 5/1/01 Rates

BellSouth		Prid	се Сар	Pricing Flexibility			
SPEED	STATISTIC	Mo-to-Mo	OPP	Average	Mo-to-Mo	OPP	Average
DS1	max	3%	-13%	-5%	8%	0%	4%
	median	3%	-13%	-5%	8%	0%	4%
DS3	max	-5%	-22%	-14%	8%	0%	4%
	median	-5%	-22%	-14%	8%	0%	4%

SBC		Р	rice Cap		Pri	icing Flexibi	lity
SPEED	STATISTIC	Mo-to-Mo	OPP	Average	Mo-to-Mo	OPP	Average
DS1	max	3%	1%	2%	21%	0%	10%
	median	-1%	-3%	-2%	13%	0%	6%
DS3	max	0%	-8%	-4%	2%	0%	1%
	median	-2%	-10%	-6%	0%	0%	0%

Verizon-S	South	F	rice Cap		Pri	icing Flexibi	lity
SPEED	STATISTIC	Mo-to-Mo	OPP	Average	Mo-to-Mo	OPP	Average
DS1	max	-7%	-11%	-9%	15%	9%	12%
	median	-7%	-11%	-9%	15%	9%	12%
DS3	max	-27%	-27%	-27%	6%	-4%	1%
	median	-27%	-27%	-27%	6%	-4%	1%

Qwest			rice Cap		Pricing Flexibility			
SPEED	STATISTIC	Mo-to-Mo	OPP	Average	Mo-to-Mo	OPP	Average	
DS1	max	-15%	-15%	-15%	25%	13%	19%	
	median	-15%	-15%	-15%	25%	13%	19%	
DS3	max	-7%	-7%	-7%	56%	42%	49%	
	median	-7%	-7%	-7%	56%	42%	49%	

Verizon-North			Price Cap		Pri	cing Flexibi	lity
SPEED	STATISTIC	Mo-to-Mo	OPP	Average	Mo-to-Mo	OPP	Average
DS1	max	-9%	-10%	-9%	10%	18%	14%
	median	-16%	-10%	-13%	10%	18%	14%
DS3	max	-10%	-10%	-10%	6%	0%	3%
	median	-10%	-10%	-10%	6%	0%	3%

General Notes for UNE Rate Comparison Workbook une\_waldbaum.xls

- 1 Current rates used were effective on August 31,2004 These are compared to rates effective May 1, 2001.
- 2 Used zone 1 rates where zoned billing is applicable.
- 3 Price calculated as 10-mile standalone circuits. That is, the same speed from AT&T POP to the customer premises provided solely by the ILEC indicated.
- 4 Tariff indicates month-to-month pricing. That is, not on a term pricing plan.
- 5 OPP indicates Optional Payment Plan. 3-year plans were used unless otherwise noted.
- 6 Did not include optional payment plans that vary by commitment to level or growth. Used only those plans that any carrier, regardless of size, could order.
- 7 DS3 priced for electrical circuits unless otherwise noted.

			2004 to Division 1: Effect May 1 2001
Comparison of costs (10)-mile	Standalone Circuit) Rates	IN Effect on August 31.	2004 to Rates in Effect on May 1, 2001

Company	State		<u>Comparis</u>	on of costs (10	<u>-mile Standalo</u>	ne Circuit) Ra	tes in Effect or	1 August 31, 2	004 to Rates in	Effect on May	1, 2001	
Company	State [	ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		1114	Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			Flex (5/1/01)		Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
BellSouth	Alabama		(0, -, 0-,	, , , , , , , , , , , , , , , , , , , ,					to Pre-Pr Fl	to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr Fl
		DS1	\$555	\$422	\$571	\$367	<b>\$</b> 601	\$422	3%	-13%	8%	0%
	Į	DS3	\$7,550	\$5,165	\$7,168	\$4,004	\$8,180	\$5,165	-5%	-22%	8%	0%
	r	TIEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		<u>ILEC</u>	Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			Flex (5/1/01)		Tariff	OPP OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
BellSouth	Georgia		riex (3/1/01)	1 lex (3/1/01)	101111	0,1	10.117	Ŭ.,	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr FI	to Pre-Pr Fl
		DS1	\$555	S422	\$571	\$367	\$601	\$422	3%	-13%	8%	0%
		DS3	\$7,550	\$5,165	\$7,168	\$4,004	\$8,180	\$5,165	-5%	-22%	8%	0%
	ı	71.50	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		<u>ILEC</u>	Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			Flex (5/1/01)	1	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
BeliSouth	Florida		TIEX (3/1/01)	LIEX (3/1/01)	Tarini	OI I	101111	011	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
	l	DS1	\$555	\$422	\$571	\$367	<b>\$</b> 601	\$422	3%	-13%	8%	0%
	[	DS3	\$7,550	\$5,165	\$7,168	\$4,004	\$8,180	\$5,165	-5%	-22%	8%	0%
	1	TIEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		<u>ILEC</u>	Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
	North			Flex (5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
BellSouth	Carolina		TEX (3/1/01)	TEX (3/1/01)	101111	011	141111	011	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
		DS1	\$555	\$422	\$571	\$367	\$601		3%	-13%	8%	0%
		DS3	\$7,550	\$5,165	\$7,168	\$4,004	\$8,180	\$5,165	-5%	-22%	8%	0%
			T. FO. T. (#	71.55.000	71.50	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
	0 - 11-		Pre-Price	Pre-Price	Price Cap Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
BellSouth	South Carolina		Fiex (5/1/U1).	Flex (5/1/01)	Latini	UPP	Tallii	OFF	to Pre-Pr Fl	to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr Fl
		DS1	\$555	\$422	\$571	\$367	<b>\$</b> 601	\$422	3%	-13%	8%	0%
		DS3	\$7,550	\$5,165	\$7,168	\$4,004	\$8,180	\$5,165	-5%	-22%	8%	0%
			T =0 T -:	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		<u>ILEC</u>	ILEC Tariff Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			Flex (5/1/01)		Tariff	OPP :	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
BeliSouth	Mississippi		Fiex (3/1/01)	Fiex (3/1/01)	161111	OFF.	101111	0.1	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
		DS1	\$555	\$422	\$571	\$367	\$601		3%	-13%	8%	0%
		DS3	\$7,550	\$5,165	\$7,168	\$4,004	\$8,180	\$5,165	-5%	-22%	8%	0%
	1	7/ 50	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		<u>ILEC</u>	Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
				Flex (5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
BellSouth	Louisiana		1 16X (2) 1/01)	1 IEX (3/1/01)	Taliii	OF F	IGINI		to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
		501	6555	6422	\$571	\$367	<b>\$</b> 601	\$422	3%	-13%	8%	0%
		DS1	\$555	\$422	33/1	3307	3601	\$5,165		-22%	8%	0%

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### Company State

BellSouth Tennessee

e	ILEC	ILEC Tariff Pre-Price Flex (5/1/01)	ILEC OPP Pre-Price Flex (5/1/01)	ILEC Price Cap Tariff	ILEC Price Cap OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Price Cap to Pre-Pr Fl	OPP % Difference Price Cap to Pre-Pr Fl	Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl	OPP % Difference Pricing Flex to Pre-Pr Fl
1	DS1	S555	\$422	\$571	\$367	\$601	\$422	3%	-13%	8%	0%
t	DS3	\$7,550	\$5,165	\$7,168	\$4,004	\$8,180	\$5,165	-5%	-22%	8%	0%

BellSouth Kentucky

, [	<u>ILEC</u>	ILEC Tariff Pre-Price Flex (5/1/01)	ILEC OPP Pre-Price Flex (5/1/01)	ILEC Price Cap Tariff	ILEC Price Cap OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Price Cap to Pre-Pr Fl	OPP % Difference Price Cap to Pre-Pr Fl	Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl	OPP % Difference Pricing Flex to Pre-Pr Fl
İ	DS1	\$555	\$422	\$571	\$367	\$601	\$422	3%	-13%	8%	0%
ı	DS3	\$7,550	\$5,165	\$7,168	\$4,004	\$8,180	\$5,165	-5%	-22%	8%	0%

- 1 DS3 assumed POP channel term and the end-user channel term are between 1/2 and 1 mile of their LEC serving wire centers.
  2 DS1 used 24-month OPPs. DS3 used 37-month.
  3 DS3: Assumed a 1-mile end-user and POP channel term.

- 4 Did not include the TSP Optional Payment Plan that requires a committed level of total access. This plan's discounts apply to Price Cap and Pricing Flexibility rates.
- 5 Did not include Pricing Flexibility contracts that require a committed level of access expense.

Company	State		Comparis	on of costs (10	)-mile Standal	one Circuit) Ra	ates in Effect o	on August 31,	2004 to Rates	in Effect on Ma	ay 1, 2001	
Company	Jiale	ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		<u> </u>	Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
				Flex (5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
Qwest	Arizona		riex (3/1/01)	Liex (2/1/01)	rariii	OPP	Tallii	OPP	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
QIIODI	7 3125110	DS1	\$465	\$410	\$395	\$350	\$582	\$465	-15%	-15%	25%	13%
	ŀ	DS3	\$3,780		\$3,520	\$3,047	\$5,900	\$4,650	-7%	-7%	56%	42%
	L		\$3,00	\$3,275	<b>3</b> 5,5 <b>2</b> 5	02,011	40,700	\$ 1,000	- : 1		20,0	.2.0
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			Flex (5/1/01)	Flex (5/1/01)	Tariff	OPP ·	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
Qwest	Colorado			(-, -,,	,				to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
		DS1	\$465	\$410	\$395	\$350	\$582	\$465	-15%	-15%	25%	13%
		DS3	\$3,780	\$3,275	\$3,520	\$3,047	\$5,900	\$4,650	-7%	-7%	56%	42%
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			Flex (5/1/01)	Flex (5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
Qwest	lowa			, ,					to Pre-Pr Fl	to Pre-Pr Fi	to Pre-Pr Fl	to Pre-Pr FI
		DS1	\$465		\$395	\$350	\$582	\$465	-15%	-15%	25%	13%
		DS3	\$3,780	\$3,275	\$3,520	\$3,047	\$5,900	\$4,650	-7%	-7%	56%	42%
			T simple line			т		7. 50		0000		222.01
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			Flex (5/1/01)	Flex (5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
Qwest	ldaho					0065	<b></b>		to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
		DS1	\$485		\$410	\$365	\$602	\$485	-15%	-15%	24%	13%
	l	DS3	\$3,780	\$3,275	\$3,520	\$3,047	\$5,900	\$4,650	-7%	-7%	56%	42%
	ı	ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		4440	Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
				Flex (5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
Qwest	Minnesota		riex (5/1/01)	Liex (2/1/01)	Tariii	UPP	Tariii	UPP	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
QII OO	iiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiii	DS1	\$465	\$410	\$395	\$350	\$582	\$465	-15%	-15%	25%	13%
		DS3	\$3,780		\$3,520	\$3,047	\$5,900	\$4,650	-7%	-7%	56%	42%
	1			4-,1	40,020	40,011	44,500	4 1,02 0			2274	
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			Flex (5/1/01)	Flex (5/1/01)	Tariff	OPP '	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
Qwest	Montana								to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
		DS1	\$485		\$410	\$365	\$602	\$485	-15%	-15%	24%	13%
		DS3	\$3,780	\$3,275	\$3,520	\$3,047	\$5,900	\$4,650	-7%	-7%	56%	42%
			1		·							
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
	No at a constant		Flex (5/1/01)	Flex (5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
Qwest	North Dakota	DC1			0410	02.5	# < 0.5	<b>#</b> 40.5	to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr FI	to Pre-Pr FI
		DS1	\$485	\$430	\$410	\$365	\$602	\$485	-15%	-15%	24%	13%

_	<b>.</b>		Comparis	on of costs (10	<u>)-mile Standal</u>	one Circuit) Ra	ates in Effect t	JII AUGUST 31,	2004 to Rates	in Effect on M	<u>ay 1, 200</u> 1	
Company	State	DS3	\$3,780	\$3,275	\$3,520	\$3,047	\$5,900	\$4,650	-7%	-7%	56%	42%
Qwest	Nebraska	ILEC	ILEC Tariff Pre-Price Flex (5/1/01)	ILEC OPP Pre-Price Flex (5/1/01)	ILEC Price Cap Tariff	ILEC Price Cap OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Price Cap to Pre-Pr FI	OPP % Difference Price Cap to Pre-Pr Fl	Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fi	OPP % Difference Pricing Flex to Pre-Pr Fl
4,,,,,,,	1102740114	DS1	\$465	\$410	\$395	\$350	\$582	<b>\$</b> 465	-15%	-15%	25%	13%
	Ī	DS3	\$3,780	\$3,275	\$3,520	\$3,047	\$5,900	\$4,650	-7%	-7%	56%	42%
	_		<del> </del>			•	· · · · · · · · · · · · · · · · · · ·					
		<u>ILEC</u>	ILEC Tariff Pre-Price	ILEC OPP Pre-Price	ILEC Price Cap	ILEC Price Cap	ILEC Pricing Flex	ILEC Pricing Flex	Mo-to-Mo % Difference	OPP % Difference	Mo-to-Mo % Difference	OPP % Difference
			Flex (5/1/01)		Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
Qwest	New Mexico		110x (3/1/01)	(3/1/01)	141111	011	101111	· · ·	to Pre-Pr Fi	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
	Ī	DS1	\$465	\$410	\$395	\$350	\$582	\$465	-15%	-15%	25%	13%
	[	DS3	\$3,780	\$3,275	\$3,520	\$3,047	\$5,900	\$4,650	-7%	-7%	56%	42%
	-			·	·· · · · · · · · · · · · · · · · · · ·					222.01		
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo % Difference	OPP % Difference	Mo-to-Mo % Difference	OPP % Difference
			Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
Owest	Oregon		Flex (5/1/01)	Fiex (5/1/01)	Tariff	OPP	Tariff	UPP	to Pre-Pr Fl	to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr Fl
Qwest	Olegen	DS1	\$465	\$410	\$395	\$350	\$582	\$465	-15%	-15%	25%	13%
	İ	DS3	\$3,780		\$3,520	\$3,047	\$5,900	\$4,650	-7%	-7%	56%	42%
											•	
	r			_						····		
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		<u>ILEC</u>	Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
Owent	South Dakota	<u>ILEC</u>		Pre-Price					Difference Price Cap	Difference Price Cap	Difference Pricing Flex	Difference Pricing Flex
Qwest	South Dakota		Pre-Price Flex (5/1/01)	Pre-Price Flex (5/1/01)	Price Cap Tariff	Price Cap OPP	Pricing Flex Tariff	Pricing Flex OPP	Difference Price Cap to Pre-Pr Fi	Difference Price Cap to Pre-Pr Fl	Difference Pricing Flex to Pre-Pr Fl	Difference Pricing Flex to Pre-Pr Fl
Qwest		DS1	Pre-Price Flex (5/1/01) \$485	Pre-Price Flex (5/1/01) \$430	Price Cap Tariff \$410	Price Cap OPP \$365	Pricing Flex Tariff \$602	Pricing Flex OPP \$485	Difference Price Cap	Difference Price Cap	Difference Pricing Flex	Difference Pricing Flex
Qwest			Pre-Price Flex (5/1/01) \$485 \$3,780	Pre-Price Flex (5/1/01) \$430 \$3,275	Price Cap Tariff \$410 \$3,520	Price Cap OPP \$365 \$3,047	Pricing Flex Tariff \$602 \$5,900	Pricing Flex OPP \$485 \$4,650	Difference Price Cap to Pre-Pr Fi -15% -7%	Difference Price Cap to Pre-Pr Fl -15% -7%	Difference Pricing Flex to Pre-Pr Fl 24% 56%	Difference Pricing Flex to Pre-Pr Fl 13% 42%
Qwest		DS1	Pre-Price Flex (5/1/01) \$485 \$3,780 ILEC Tariff	Pre-Price Flex (5/1/01) \$430 \$3,275	Price Cap Tariff \$410 \$3,520	Price Cap OPP \$365 \$3,047	Pricing Flex Tariff \$602 \$5,900	Pricing Flex OPP \$485 \$4,650	Difference Price Cap to Pre-Pr Fi -15% -7% Mo-to-Mo %	Difference Price Cap to Pre-Pr Fl -15% -7% OPP %	Difference Pricing Flex to Pre-Pr Fl 24% 56% Mo-to-Mo %	Difference Pricing Flex to Pre-Pr Fl 13% 42%
Qwest		DS1 DS3	Pre-Price Flex (5/1/01) \$485 \$3,780 ILEC Tariff Pre-Price	Pre-Price Flex (5/1/01) \$430 \$3,275 ILEC OPP Pre-Price	Price Cap Tariff \$410 \$3,520  ILEC Price Cap	Price Cap OPP \$365 \$3,047 ILEC Price Cap	Pricing Flex Tariff \$602 \$5,900  ILEC Pricing Flex	Pricing Flex OPP \$485 \$4,650  ILEC Pricing Flex	Difference Price Cap to Pre-Pr Fi -15% -7%  Mo-to-Mo % Difference	Difference Price Cap to Pre-Pr Fl -15% -7%  OPP % Difference	Difference Pricing Flex to Pre-Pr Fl 24% 56%  Mo-to-Mo % Difference	Difference Pricing Flex to Pre-Pr Fl 13% 42%  OPP % Difference
	Dakota	DS1 DS3	Pre-Price Flex (5/1/01) \$485 \$3,780 ILEC Tariff	Pre-Price Flex (5/1/01) \$430 \$3,275 ILEC OPP Pre-Price	Price Cap Tariff \$410 \$3,520	Price Cap OPP \$365 \$3,047	Pricing Flex Tariff \$602 \$5,900	Pricing Flex OPP \$485 \$4,650	Difference Price Cap to Pre-Pr Fi -15% -7%  Mo-to-Mo % Difference Price Cap	Difference Price Cap to Pre-Pr Fl -15% -7%  OPP % Difference Price Cap	Difference Pricing Flex to Pre-Pr Fl 24% 56%  Mo-to-Mo % Difference Pricing Flex	Difference Pricing Flex to Pre-Pr Fl 13% 42% OPP % Difference Pricing Flex
Qwest Qwest		DS1 DS3	Pre-Price Flex (5/1/01) \$485 \$3,780 ILEC Tariff Pre-Price Flex (5/1/01)	Pre-Price Flex (5/1/01) \$430 \$3,275 ILEC OPP Pre-Price Flex (5/1/01)	Price Cap Tariff  \$410 \$3,520  ILEC Price Cap Tariff	\$365 \$3,047 ILEC Price Cap OPP	Pricing Flex Tariff \$602 \$5,900  ILEC Pricing Flex Tariff	Pricing Flex OPP \$485 \$4,650 ILEC Pricing Flex OPP	Difference Price Cap to Pre-Pr Fi -15% -7%  Mo-to-Mo % Difference Price Cap to Pre-Pr Fi	Difference Price Cap to Pre-Pr Fl -15% -7%  OPP % Difference Price Cap to Pre-Pr Fl	Difference Pricing Flex to Pre-Pr Fl 24% 56%  Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl	Difference Pricing Flex to Pre-Pr Fl 13% 42%  OPP % Difference Pricing Flex to Pre-Pr Fl
	Dakota	DS1 DS3 ILEC	Pre-Price Flex (5/1/01) \$485 \$3,780 ILEC Tariff Pre-Price Flex (5/1/01)	Pre-Price Flex (5/1/01) \$430 \$3,275 ILEC OPP Pre-Price Flex (5/1/01)	Price Cap Tariff  \$410 \$3,520  ILEC Price Cap Tariff  \$395	Price Cap OPP \$365 \$3,047 ILEC Price Cap OPP	Pricing Flex Tariff  \$602 \$5,900  ILEC Pricing Flex Tariff  \$582	Pricing Flex OPP \$485 \$4,650 ILEC Pricing Flex OPP	Difference Price Cap to Pre-Pr FI -15% -7%  Mo-to-Mo % Difference Price Cap to Pre-Pr FI -15%	Difference Price Cap to Pre-Pr Fl -15% -7%  OPP % Difference Price Cap to Pre-Pr Fl -15%	Difference Pricing Flex to Pre-Pr Fl 24% 56%  Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl 25%	Difference Pricing Flex to Pre-Pr Fl 13% 42%  OPP % Difference Pricing Flex to Pre-Pr Fl 13%
	Dakota	DS1 DS3	Pre-Price Flex (5/1/01) \$485 \$3,780 ILEC Tariff Pre-Price Flex (5/1/01)	Pre-Price Flex (5/1/01) \$430 \$3,275 ILEC OPP Pre-Price Flex (5/1/01) \$410 \$3,275	Price Cap Tariff  \$410 \$3,520  ILEC Price Cap Tariff  \$395 \$3,520	\$365 \$3,047 ILEC Price Cap OPP \$350 \$3,047	\$602 \$5,900 ILEC Pricing Flex Tariff \$582 \$5,900	Pricing Flex OPP \$485 \$4,650 ILEC Pricing Flex OPP \$465 \$4,650	Difference Price Cap to Pre-Pr Fi -15% -7%  Mo-to-Mo % Difference Price Cap to Pre-Pr Fi	Difference Price Cap to Pre-Pr Fl -15% -7%  OPP % Difference Price Cap to Pre-Pr Fl -15% -7%	Difference Pricing Flex to Pre-Pr Fl 24% 56%  Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl	OPP % Difference Pricing Flex to Pre-Pr Fl 13% 42%  OPP % Difference Pricing Flex to Pre-Pr Fl 13% 42%
	Dakota	DS1 DS3 ILEC	Pre-Price Flex (5/1/01)  \$485 \$3,780  ILEC Tariff Pre-Price Flex (5/1/01)  \$465 \$3,780  ILEC Tariff	Pre-Price Flex (5/1/01) \$430 \$3,275 ILEC OPP Pre-Price Flex (5/1/01) \$410 \$3,275	Price Cap Tariff  \$410 \$3,520  ILEC Price Cap Tariff  \$395 \$3,520  ILEC	Price Cap OPP \$365 \$3,047 ILEC Price Cap OPP \$350 \$3,047	Pricing Flex Tariff  \$602 \$5,900  ILEC Pricing Flex Tariff  \$582 \$5,900  ILEC	Fricing Flex OPP  \$485 \$4,650  ILEC Pricing Flex OPP  \$465 \$4,650  ILEC	Difference Price Cap to Pre-Pr Fi -15% -7%  Mo-to-Mo % Difference Price Cap to Pre-Pr Fi -15% -7%  Mo-to-Mo %	OPP % OPP % OPP % OPP % OPP FI  -15% OPP % OPF FI  -15% -7% OPP % OPP % OPP %	Difference Pricing Flex to Pre-Pr Fl 24% 56%  Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl 25% 56%  Mo-to-Mo %	Difference Pricing Flex to Pre-Pr Fl 13% 42%  OPP % Difference Pricing Flex to Pre-Pr Fl 13% 42%  OPP %
	Dakota	DS1 DS3 ILEC DS1 DS3	Pre-Price Flex (5/1/01)  \$485 \$3,780  ILEC Tariff Pre-Price Flex (5/1/01)  \$465 \$3,780  ILEC Tariff Pre-Price	Pre-Price Flex (5/1/01) \$430 \$3,275  ILEC OPP Pre-Price Flex (5/1/01) \$410 \$3,275  ILEC OPP Pre-Price	Frice Cap Tariff  \$410 \$3,520  ILEC Price Cap Tariff  \$395 \$3,520  ILEC Price Cap	S365 \$3,047  ILEC Price Cap OPP  \$350 \$3,047  ILEC Price Cap	\$602 \$5,900 ILEC Pricing Flex Tariff \$582 \$5,900 ILEC Pricing Flex	Pricing Flex OPP  \$485 \$4,650  ILEC Pricing Flex OPP  \$465 \$4,650  ILEC Pricing Flex	Difference Price Cap to Pre-Pr Fi -15% -7%  Mo-to-Mo % Difference Price Cap to Pre-Pr Fi -15% -7%  Mo-to-Mo % Difference	OPP % OPP % OPP % OPP Price Cap to Pre-Pr Fl -15% -7% OPP % OFF Fl -15% -7% OPP % Difference	Difference Pricing Flex to Pre-Pr Fl 24% 56%  Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl 25% 56%  Mo-to-Mo % Difference	OPP % Difference Pricing Flex to Pre-Pr Fl 13% 42%  OPP % Difference Pricing Flex to Pre-Pr Fl 13% 42%  OPP % Difference
Qwest	Dakota Utah	DS1 DS3 ILEC DS1 DS3	Pre-Price Flex (5/1/01)  \$485 \$3,780  ILEC Tariff Pre-Price Flex (5/1/01)  \$465 \$3,780  ILEC Tariff	Pre-Price Flex (5/1/01) \$430 \$3,275  ILEC OPP Pre-Price Flex (5/1/01) \$410 \$3,275  ILEC OPP Pre-Price	Price Cap Tariff  \$410 \$3,520  ILEC Price Cap Tariff  \$395 \$3,520  ILEC	Price Cap OPP \$365 \$3,047 ILEC Price Cap OPP \$350 \$3,047	Pricing Flex Tariff  \$602 \$5,900  ILEC Pricing Flex Tariff  \$582 \$5,900  ILEC	Fricing Flex OPP  \$485 \$4,650  ILEC Pricing Flex OPP  \$465 \$4,650  ILEC	Difference Price Cap to Pre-Pr Fi -15% -7%  Mo-to-Mo % Difference Price Cap to Pre-Pr Fi -15% -7%  Mo-to-Mo % Difference	OPP % OPP % OPP FI  -15% -7%  OPP Side Cap to Pre-Pr FI  -15% -7%  OPP FI  -15% -7%  OPP Side Cap to Pre-Pr FI  -15% -7%  OPP Side Cap Difference Price Cap	Difference Pricing Flex to Pre-Pr Fl  24% 56%  Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl  25% 56%  Mo-to-Mo % Difference Pricing Flex	OPP % Difference Pricing Flex to Pre-Pr Fl  13% 42%  OPP % Difference Pricing Flex to Pre-Pr Fl  13% 42%  OPP % Difference Pricing Flex to Pre-Pr Fl
	Dakota	DS1 DS3 ILEC DS1 DS3 ILEC	Pre-Price Flex (5/1/01)  \$485 \$3,780  ILEC Tariff Pre-Price Flex (5/1/01)  \$465 \$3,780  ILEC Tariff Pre-Price Flex (5/1/01)	Pre-Price Flex (5/1/01) \$430 \$3,275  ILEC OPP Pre-Price Flex (5/1/01) \$410 \$3,275  ILEC OPP Pre-Price Flex (5/1/01)	Price Cap Tariff  \$410 \$3,520  ILEC Price Cap Tariff  \$395 \$3,520  ILEC Price Cap Tariff	S365 \$3,047  ILEC Price Cap OPP  \$350 \$3,047  ILEC Price Cap OPP	Pricing Flex Tariff  \$602 \$5,900  ILEC Pricing Flex Tariff  \$582 \$5,900  ILEC Pricing Flex Tariff	Pricing Flex OPP  \$485 \$4,650  ILEC Pricing Flex OPP  \$465 \$4,650  ILEC Pricing Flex OPP	Difference Price Cap to Pre-Pr Fi  -15% -7%  Mo-to-Mo % Difference Price Cap to Pre-Pr Fi  -15% -7%  Mo-to-Mo % Difference	OPP % OPP % OPP FI  -15% -7%  OPP % Difference Price Cap to Pre-Pr FI  -15% -7%  OPP % Difference Price Cap to Pre-Pr FI  OPP % Difference Price Cap	Difference Pricing Flex to Pre-Pr Fl 24% 56%  Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl 25% 56%  Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl 25% 56%	OPP % Difference Pricing Flex to Pre-Pr Fl  13% 42%  OPP % Difference Pricing Flex to Pre-Pr Fl  13% 42%  OPP % Difference Pricing Flex to Pre-Pr Fl  to Pre-Pr Fl  Pricing Flex to Pre-Pr Fl
Qwest	Dakota Utah	DS1 DS3 ILEC DS1 DS3	Pre-Price Flex (5/1/01)  \$485 \$3,780  ILEC Tariff Pre-Price Flex (5/1/01)  \$465 \$3,780  ILEC Tariff Pre-Price	Pre-Price Flex (5/1/01) \$430 \$3,275  ILEC OPP Pre-Price Flex (5/1/01) \$410 \$3,275  ILEC OPP Pre-Price Flex (5/1/01) \$410 \$3,410	Frice Cap Tariff  \$410 \$3,520  ILEC Price Cap Tariff  \$395 \$3,520  ILEC Price Cap	S365 \$3,047  ILEC Price Cap OPP  \$350 \$3,047  ILEC Price Cap	\$602 \$5,900 ILEC Pricing Flex Tariff \$582 \$5,900 ILEC Pricing Flex	Pricing Flex OPP  \$485 \$4,650  ILEC Pricing Flex OPP  \$465 \$4,650  ILEC Pricing Flex OPP	Difference Price Cap to Pre-Pr Fi -15% -7%  Mo-to-Mo % Difference Price Cap to Pre-Pr Fi -15% -7%  Mo-to-Mo % Difference	OPP % OPP % OPP FI  -15% -7%  OPP Side Cap to Pre-Pr FI  -15% -7%  OPP FI  -15% -7%  OPP Side Cap to Pre-Pr FI  -15% -7%  OPP Side Cap Difference Price Cap	Difference Pricing Flex to Pre-Pr Fl  24% 56%  Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl  25% 56%  Mo-to-Mo % Difference Pricing Flex	OPP % Difference Pricing Flex to Pre-Pr Fl  13% 42%  OPP % Difference Pricing Flex to Pre-Pr Fl  13% 42%  OPP % Difference Pricing Flex to Pre-Pr Fl

Company State

Qwest Wyoming

	ILEC	ILEC Tariff Pre-Price Flex (5/1/01)	ILEC OPP Pre-Price Flex (5/1/01)	ILEC Price Cap Tariff	ILEC Price Cap OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Price Cap to Pre-Pr Fl	OPP % Difference Price Cap to Pre-Pr Fi	Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl	OPP % Difference Pricing Flex to Pre-Pr Fl
Г	DS1	\$485	\$430	\$410	\$365	\$602	\$485	-15%	-15%	24%	13%
ſ	DS3	\$3,780	\$3,275	\$3,520	\$3,047	\$5,900	\$4,650	-7%	-7%	56%	42%

Company State		Comparis	on of costs (10	-mile Standal	one Circuit) Ra	tes in Effect or	1 August 31, 2	004 to Rates i	n Effect on May	<u>/ 1, 2001</u>	
. , ,	ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
		(5/1/01)	(5/1/01)	Tariff	OPP	⊤ariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
SBC:Ameritech Illinois								to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr FI
	DS1	\$974	\$434	S964	\$407	\$974	\$434	-1%	-6%	0%	0%
	DS3	\$9,300	\$3,516	\$9,260	\$3,150	\$9,460	\$3,516	0%	-10%	2%	0%
	<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
		(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
SBC:Ameritech Indiana								to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
	DS1	\$1,025	\$459	\$1,013	\$435	\$1,025	\$459	-1%	-5%	0%	0%
	DS3	\$9,570	\$3,643	\$9,550	\$3,290	\$9,750	\$3,643	0%	-10%	2%	0%
		T 11 = 0 = 100 T	1, 50 000 T	<del></del>							
	TLEC	I HEC Tariff	THEC OPP	TLEC	THEC	TI EC	TLEC	Mosto-Mo % i	ODD %	Mo-to-Mo %	ODD 96

SBC:Ameritech Michigan

Ţ	<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
1		Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
1		(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
L								to Pre-Pr FI	to Pre-Pr F1	to Pre-Pr Fl	to Pre-Pr Fl
L	DS1	\$1,002	\$447	\$998	\$422	\$1,002	\$447	0%	-6%	0%	0%
L	DS3	\$9,470	\$3,600	\$9,410	\$3,240	\$9,610	\$3,600	-1%	-10%	1%	0%

SBC:Ameritech Ohio

ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
	Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
	(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
							to Pre-Pr FI	to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr Fl
DS1	\$1,002	\$447	\$998	S422	\$1,002	\$447	0%	-6%	0%	0%
DS3	\$9,470	\$3,600	\$9,410	\$3,240	\$9,610	\$3,600	-1%	-10%	1%	0%

SBC:Ameritech Wisconsin

<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
	Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
	(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
							to Pre-Pr Fl	to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr FI
DS1	\$1,025	\$459	\$1,013	\$435	\$1,025	\$459	-1%	-5%	0%	0%
DS3	\$9,570	\$3,643	\$9,550	\$3,290	\$9,750	\$3,643	0%	-10%	2%	0%
	DS1	Pre-Price Flex (5/1/01) DS1 \$1,025	Pre-Price Flex (5/1/01) (5/1/01)  DS1 \$1,025 \$459	Pre-Price Flex Pre-Price Flex Price Cap (5/1/01) (5/1/01) Tariff  DS1 \$1,025 \$459 \$1,013	Pre-Price Flex   Pre-Price Flex   Price Cap   Price Cap   OPP	Pre-Price Flex   Pre-Price Flex   Price Cap   Price Cap   OPP   Tariff	Pre-Price Flex (5/1/01)         Pre-Price Flex (5/1/01)         Price Cap (5/1/01)         Price Cap (OPP)         Pricing Flex (OPP)         Pricing Flex (OPP)           DS1         \$1,025         \$459         \$1,013         \$435         \$1,025         \$459	Pre-Price Flex (5/1/01)         Pre-Price Flex (5/1/01)         Price Cap (5/1/01)         Price Cap (OPP)         Pricing Flex (OPP)         Pricing Flex (OPP)         Pricing Flex (OPP)         Difference (OPP)         Price Cap (OPP)         Pricing Flex (OPP)         Pricing Flex (OPP)         Difference (OPP)         Price Cap (OPP)         Price Cap (OPP)         Price Cap (OPP)         Pricing Flex (OPP)         Pricing Flex (OPP)         Price Cap (OPP)         P	Pre-Price Flex (5/1/01) (5/1/01) Price Cap (5/1/01)	Pre-Price Flex (5/1/01) (5/1/01) Fariff OPP Price Cap OPP Tariff OPP Tariff OPP Tariff OPP Tariff OPP Tariff OPP Tariff OPP Tariff OPP Tariff OPP Tariff OPP Tariff OPP Tariff OPP Tariff OPP Tariff OPP OPP Tariff OPP OPP Tariff OPP OPP OPP OPP OPP OPP OPP OPP OPP O

<sup>1</sup> Fixed mileage rates in the tariff were doubled as they are in ABC: Ameritech's billing.
2 Did not include the MVP Optional Payment Plan that requires a committed level of total access. This plan's discounts apply to Price Cap and Pricing Flexibility rates.

Company State

SBC: Pac Bell California

<u>ILEC</u>	ILEC Tariff Pre-Price Flex (5/1/01)	ILEC OPP Pre-Price Flex (5/1/01)	ILEC Price Cap Tariff	ILEC Price Cap OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Price Cap to Pre-Pr Fl	OPP % Difference Price Cap to Pre-Pr Fl	Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl	OPP % Difference Pricing Flex to Pre-Pr Fl
DS1	\$411	\$360	\$389	\$365	\$495	\$358	-5%	1%	21%	-1%
DS3	\$5,810	\$3,100	\$5,005	\$2,290	\$5,810	\$2,880	-14%	-26%	0%	-7%

<sup>1</sup> Did not include the MVP Optional Payment Plan that requires a committed level of total access. This plan's discounts apply to Price Cap and Pricing Flexibility rates.

<sup>2</sup> Did not include the DVP Optional Payment Plan that requires a committed level of total DS1 access. This plan's discounts apply to Price Cap and Pricing Flexibility rates.

Company	State		Comparis	on of costs (10	-mile Standal	one Circuit) Ra	tes in Effect or	n August 31, 2	004 to Rates ii	n Effect on May	1, 2001	
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
SBC:SWBT	Arkansas								to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
		DS1	\$588		\$577	\$393	\$665	\$393	-2%		13%	-1%
		DS3	\$5,625	\$3,750	\$5,525	\$3,460	\$5,625	\$3,750	-2%	-8%	0%	0%
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	71.50	71.50	M- 1- 14- 01	0000		
		ILEC		Pre-Price Flex			ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
						Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
SBC:SWBT	Kansas		(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
020.0170.	Tallous .	DS1	\$588	\$398	\$577	\$393	\$665	\$393	to Pre-Pr Fl -2%	to Pre-Pr Fl -1%	to Pre-Pr Fl 13%	to Pre-Pr Fl
		DS3	\$5,625		\$5,525	\$3,460	\$5,625	\$3,750	-2% -2%	-1%	13%	-1% 0%
		203	1 55,025	33,130	\$5,525	33,400	45,025	33,730	-270	-070	0%	0%
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
SBC:SWBT	Missouri			(-, -,,				<u> </u>	to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr FI
	1	DS1	\$588	\$394	\$577	\$393	\$665	S393	-2%	0%	13%	0%
		DS3	\$5,625	\$3,750	\$5,525	\$3,460	\$5,625	\$3,750	-2%	-8%	0%	0%
	1	71.50	1 11 50 7 155									
	l	<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price Flex		Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
SBC:SWBT	Oklahoma		(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
300.34101	Oklanoma	DS1	\$588	f200	0.525	****	2000		to Pre-Pr Fl	to Pre-Pr FI	to Pre-Pr Fi	to Pre-Pr Fl
	ŀ	DS3	\$5,625	\$398	\$577	\$393	\$665	\$393	-2%	-1%	13%	-1%
	ı	<u> </u>	33,023	\$3,750	\$5,525	\$3,460	\$5,625	\$3,750	-2%	-8%	0%	0%
	[	ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
	•		Pre-Price Flex		Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
SBC:SWBT	Texas		(3/1/01)	(3/1/01)	Tallii	OPP	Idiiii	OPP	to Pre-Pr FI	to Pre-Pr FI	to Pre-Pr FI	to Pre-Pr Fi
	1	DS1	\$558	\$404	\$577	\$393	\$665	\$393	3%	-3%	19%	-3%
	1	DS3	\$5,625	\$3,750	\$5,525	\$3,460	\$5,625	\$3,750	-2%	-8%	0%	0%
	•										070	0.70
Notes;	1	Did not include the	MVP Optional Pay	ment Pian that requ	ires a commited le	vel of total access.	This plan's discour	nts apply to Price C	ap and Pricing Flex	ribility rates.		

1

Verizon: Bell Atlantic-North   Verizon: Bell Atlantic-North
Verizon: Bell Atlantic-North   Verizon: Bell Atlantic-North
North   Maine   DS1   \$832   \$582   \$5702   \$526   \$915   \$686   -16%   -10%   10%   10%
Verizon:   Bell Atlantic-North   Verizon:   Bell Atlantic-North
Verizon:   Bell Atlantic-North   Verizon:   Bell Atlantic-North
Verizon:   Bell Atlantic-   North
Verizon:   Bell Atlantic-   North
New North North New Hampshire   (5/1/01) (5/1/01)   Tariff   OPP   Tariff   OPP   Tariff   OPP   Price Cap to Pre-Pr Fl
North   Hampshire   DS1
DS1   \$832   \$582   \$702   \$526   \$915   \$686   -16%   -10%   10%     DS3   \$5,456   \$4,911   \$4,919   \$4,427   \$5,764   \$4,911   -10%   -10%   6%     Verizon: Belf Atlantic-North   Vermont   DS1   \$832   \$582   \$702   \$526   \$915   \$686   -16%   -16%   -10%   6%     Verizon: Belf Atlantic-North   Vermont   DS1   \$832   \$582   \$702   \$526   \$915   \$686   -16%   -10%   0PP %     DS1   \$832   \$582   \$702   \$526   \$915   \$686   -16%   -10%   0PP %     DS3   \$5,456   \$4,911   \$4,919   \$4,427   \$5,764   \$4,911   -10%   -10%   0PP %     DS3   \$5,456   \$4,911   \$4,919   \$4,427   \$5,764   \$4,911   -10%   -10%   0PP %     Verizon:   Verizon:   Difference Price Flex Pre-Price Flex Pre-Price Flex Price Cap Price Cap Pricing Flex Pre-Price Flex Price Cap Price Cap Pricing Flex Price Cap Pricing Flex Pricing Flex Price Cap Pricing Flex Price Cap Pricing Flex Pricing Flex Pricing Flex Price Cap Pricing Flex Pricing Flex Pricing Flex Price Cap Pricing Flex Pricing Flex Pricing Flex Price Cap Pricing Flex
Verizon:   Verizon:
Verizon:   Verizon:
Verizon: Bell Atlantic- North Vermont  Pre-Price Flex Pre-Price Flex (5/1/01)  Sell Atlantic- North Vermont  Pre-Price Flex (5/1/01)  Sell Atlantic- North  Price Cap (5/1/01)  Sell Atlantic- North  Price Cap (5/1/01)  Sell Atlantic- North  DS1 Sell Sell Sell Sell Sell Sell Sell Se
Verizon: Bell Atlantic- North Vermont  Pre-Price Flex Pre-Price Flex (5/1/01)  Sell Atlantic- North Vermont  Pre-Price Flex (5/1/01)  Sell Atlantic- North  Price Cap (5/1/01)  Sell Atlantic- North  Price Cap (5/1/01)  Sell Atlantic- North  DS1 Sell Sell Sell Sell Sell Sell Sell Se
North   Vermont   North   Vermont   Self Atlantic-North   Self Atlan
North   Vermont   Vermon
DS1   \$832   \$582   \$702   \$526   \$915   \$686   -16%   -10%   10%     DS3   \$5,456   \$4,911   \$4,919   \$4,427   \$5,764   \$4,911   -10%   -10%   6%     ILEC Tariff   ILEC OPP   ILEC   ILEC   ILEC   ILEC   Mo-to-Mo %   OPP %     Verizon:
DS3 S5,456 \$4,911 \$4,919 \$4,427 \$5,764 \$4,911 -10% -10% 6%  ### ILEC Tariff   ILEC OPP   ILEC   ILEC   ILEC   ILEC   Mo-to-Mo %   OPP %   Mo-to-Mo %   OPP %   Verizon: Verizo
Verizon:  ILEC Tariff ILEC OPP ILEC ILEC ILEC ILEC Mo-to-Mo % OPP % Mo-to-Mo % OPP %
Verizon: Pre-Price Flex Pre-Price Flex Price Cap Price Cap Pricing Flex Pricing Flex Difference Dif
verizon:
Bell Atlantic (5/1/01) (5/1/01) Tariff OPP Tariff OPP Price Cap Price Cap Pricing Flex   Pricing
North Massachusetts to Pre-Pr Fi to Pre-Pr F
DS1 \$709 \$567 \$633 \$475 \$780 \$585 -11% -16% 10%
DS3 \$5,176 \$4,659 \$4,655 \$4,190 \$5,456 \$4,659 -10% -10% 5%
ILEC TAIN ILEC OPP ILEC ILEC ILEC ILEC Mo-to-Mo % OPP % Mo-to-Mo % OPP %
Verizon: Pre-Price Flex Pre-Price Flex Price Cap Price Cap Pricing Flex Pricing Flex Difference Dif
Bell Atlantic (5/1/01) (5/1/01) Tariff OPP Tariff OPP Price Cap Price Cap Pricing Flex Pricing Fl
North Rhode Island   to Pre-Pr FI
DS3 \$5,456 \$4,911 \$4,919 \$4,427 \$5,764 \$4,911 -10% -10% 6%
ILEC Tariff ILEC OPP ILEC ILEC ILEC ILEC Mo-to-Mo % OPP % Mo-to-Mo % OPP %
De Drive Flow Date Flow Drive Com Difference Difference Difference Difference Difference
venzon:
Bell Atlantic- (5/1/01) (5/1/01) Tariff OPP Tariff OPP Price Cap Price Cap Pricing Flex Pricing Flex  North New York to Pre-Pr Fl to Pr
DS1 \$651 \$521 \$593 \$445 \$716 \$5379% -15% 10%
DS3 \$5,176 \$4,659 \$4,655 \$4,190 \$5,456 \$4,659 -10% -10% 5%

<sup>1</sup> DS3 POP Channel Terms are priced based on the number of DS3 channels, both channel terms and entrance facilities, from the specific LEC LSO to the specific customer designated premises. Used count of 25+ (AT&T's modal value, near the lowest value) for the POP channel term rate. The end-user rate is a secondary channel term rate.

2 Did not include Pricing Flexibility contracts that require a committed level of access expense.

Company	State		Comparis	on of costs (10	-mile Standalo	ne Circuit) Ral	es in Effect on	August 31, 20	04 to Rates in	Effect on May	1, 2001	
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
Verizon:			Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
Bell Atlantic-			Flex (5/1/01)	Flex (5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
South	Delaware								to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
		DS1	\$679	\$535	\$632	S478	\$780	\$585	-7%	-11%	15%	9%
		DS3	\$6,368	\$5,731	\$4,655	\$4,190	\$6,767	\$5,510	-27%	-27%	6%	-4%
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
Verizon:			Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
Bell Allantic-			1	Flex (5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
South	New Jersey		1 icx (5/1/01)	, , , , , , , , , , , , , , , , , , , ,	101111	OFF	raini	000	to Pre-Pr FI	to Pre-Pr Fi	to Pre-Pr Fl	to Pre-Pr Fl
		DS1	\$679	\$535	\$632	\$478	\$780	\$585	-7%	-11%	15%	9%
		DS3	\$6,368	\$5,731	\$4,655	\$4,190	\$6,767	\$5,510	-27%	-27%	6%	-4%
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
Venzon:			Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
Bell Atlantic- South	Pennsylvania		Flex (5/1/01)	Flex (5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
Coun	1 Sinisylvania	DS1	\$679	S535	\$632	\$478	\$780	\$585	to Pre-Pr Fl -7%	to Pre-Pr FI	to Pre-Pr FI 15%	to Pre-Pr FI 9%
		DS3	\$6,368		\$4,655	\$4,190	\$6,767	\$5,510	-27%	-27%	13%	-4%
		200		\$5,79.1	\$4,035	\$7,170	40,707	\$5,510	-2179	-2170	070	
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
Verizon:			Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
Bell Atlantic-			Flex (5/1/01)	Flex (5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
South	Maryland	501	-						to Pre-Pr Fl	to Pre-Pr Fi	to Pre-Pr FI	to Pre-Pr Fl
		DS1	\$679	\$535	\$632	\$478	\$780	\$585	-7%	-11%	15%	9%
		DS3	\$6,368	\$5,731	\$4,655	\$4,190	\$6,767	\$5,510	-27%	-27%	6%	-4%
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
Verizon:			Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
Bell Atlantic-			Flex (5/1/01)	Flex (5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
South	Vîrginia		1					• • • • • • • • • • • • • • • • • • • •	to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
		DS1	\$679	\$535	\$632	\$478	\$780	\$585	-7%	-11%	15%	9%
		DS3	\$6,368	\$5,731	\$4,655	\$4,190	\$6,767	\$5,510	-27%	-27%	6%	-4%
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		*****	Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
Verizon: Bell Atlantic-			1	Flex (5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
South	DC		TEX (3/1/01)	11EX (3/1/01)	Tallit	OPP	Tailli	UPP	to Pre-Pr FI	to Pre-Pr Fi	to Pre-Pr Fl	to Pre-Pr Fl
		DS1	\$679	\$535	\$632	\$478	\$780	\$585	-7%	-11%	15%	9%
		DS3	\$6,368	\$5,731	\$4,655	\$4,190	\$6,767	\$5,510	-27%	-27%	6%	-4%
			T = ==	·								
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
Verizon:			Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
Bell Atlantic- South	West Virginia		Flex (5/1/01)	Fiex (5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap to Pre-Pr Fl	Price Cap to Pre-Pr FI	Pricing Flex to Pre-Pr Fl	Pricing Flex to Pre-Pr Fl
	ungana	DS1	\$679	\$535	\$632	\$478	\$780	\$585	-7%	-11%	15%	to Pre-Pr Fi 9%
		DS3	\$6,368	\$5,731	\$4,655	\$4,190	\$6,767	\$5,510	-27%	-27%	6%	-4%
	'		, ,,,,,,,,	,,,,,,	2.,555	# 1,130]	50,107	\$5,510	-2170	-21/0	076	-4/0

Notes:

<sup>1</sup> DS3 POP Channel Terms are priced based on the number of DS3 channels, both channel terms and entrance facilities, from the specific LEC LSO to the specific customer designated premises. Used count of 25+ (AT&T's modal value, near the lowest value) for the POP channel term rate. The end-user rate is a secondary channel term rate.

2 Did not include Pricing Flexibility contracts that require a committed level of access expense.

# Comparison Summary 3-yr, 0-mile circuits

## Rates used were effective on August 31, 2004 Price Cap and Pricing Flexibility compared to Common 5/1/01 Rates

BellSouth		Pri	се Сар		Pricing Flexibility				
SPEED	STATISTIC	Mo-to-Mo	OPP	Average	Mo-to-Mo	OPP	Average		
DS1	max	12%	-2%	5%	12%	0%	6%		
	median	12%	-2%	5%	12%	0%	6%		
DS3	max	-3%	-23%	-13%	8%	0%	4%		
	median	-3%	-23%	-13%	8%	0%	4%		

Qwest		P	rice Cap		Pricin	g Flexibil	ity
SPEED	STATISTIC	Mo-to-Mo	OPP	Average	Mo-to-Mo	OPP	Average
D\$1	max	-2%	-2%	-2%	43%	24%	34%
	median	-2%	-2%	-2%	43%	24%	34%
DS3	max	-7%	-7%	-7%	47%	32%	39%
	median	-7%	-7%	-7%	47%	32%	39%

SBC		Pric	e Cap		Pricing Flexibility			
SPEED	STATISTIC	Mo-to-Mo	OPP	Average	Mo-to-Mo	OPP	Average	
DS1	max	1%	12%	6%	19%	7%	13%	
	median	-1%	-1%	-1%	17%	0%	9%	
DS3	max	0%	-8%	-4%	3%	0%	1%	
	median	-3%	-12%	-7%	0%	0%	0%	

Verizon-North		Pr	rice Cap		Pricin	g Flexibil	ity
SPEED	STATISTIC	Mo-to-Mo	OPP	Average	Mo-to-Mo	OPP	Average
DS1	max	0%	-6%	-3%	10%	18%	14%
	median	-13%	-7%	-10%	10%	18%	14%
DS3	max	-6%	-6%	-6%	10%	0%	5%
-	median	-6%	-6%	-6%	10%	0%	5%

Verizon-South	I .	Pri	се Сар		Prie	cing Flexibili	ty
SPEED	STATISTIC	Mo-to-Mo	OPP	Average	Mo-to-Mo	OPP	Average
DS1	max	-6%	-16%	-11%	8%	-4%	2%
	median	-6%	-16%	-11%	8%	-4%	2%
DS3	max	-34%	-34%	-34%	10%	-6%	2%
	median	-34%	-34%	-34%	10%	-6%	2%

## General Notes for UNE Rate Comparison Workbook une\_waldbaum.xls

- 1 Current rates used were effective on August 31,2004. These are compared to rates effective May 1, 2001.
- 2 Used zone 1 rates where zoned billing is applicable.
- 3 Price calculated as 10-mile standalone circuits. That is, the same speed from AT&T POP to the customer premises provided solely by the ILEC indicated.
- 4 Tariff indicates month-to-month pricing. That is, not on a term pricing plan.
- 5 OPP indicates Optional Payment Plan. 3-year plans were used unless otherwise noted.
- 6 Did not include optional payment plans that vary by commitment to level or growth. Used only those plans that any carrier, regardless of size, could order.
- 7 DS3 priced for electrical circuits unless otherwise noted.

0	Chata		Comparis	on of costs (0-	mile Standalon	e Circuit) Rate	s in Effect on A	August 31, 200	4 to Rates in E	ffect on May 1	2001	
Company	State	ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price Flex		Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
BellSouth	Alabama		(3/1/01)	(3/1/01)	101111	ŭ., l		0.,	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
551100441	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	DS1	\$300	\$252	\$336	\$248	\$336	\$252	12%	-2%	12%	0%
		DS3	\$4,670	\$3,500	\$4,552	\$2,704	\$5,050	\$3,500	-3%	-23%	8%	0%
												<del></del>
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
BellSouth	Georgia		(-, -, -,	( , , ,					to Pre-Pr FI	to Pre-Pr F1	to Pre-Pr Fl	to Pre-Pr Fl
		DS1	\$300	\$252	\$336	\$248	\$336	\$252	12%	-2%	12%	0%
		DS3	\$4,670	\$3,500	\$4,552	\$2,704	\$5,050	\$3,500	-3%	-23%	8%	0%
							T		N . N . N . N	ODD 0/	Mo-to-Mo %	OPP %
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %		Difference
			Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
BellSouth	Florida						****	0050	to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr FI 12%	to Pre-Pr FI 0%
		DS1	\$300	\$252	\$336	\$248	\$336	\$252	12%	-2%	8%	0%
		DS3	\$4,670	\$3,500	\$4,552	\$2,704	\$5,050	\$3,500	-3%	-23%	8%	0%
			T			71.50	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC			Difference	Difference	Difference	Difference
				Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex
	North		(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	to Pre-Pr Fl	to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr Fl
BellSouth	Carolina			00.53	\$336	\$248	\$336	\$252	12%	-2%	12%	0%
		DS1	\$300	\$252		\$248 \$2,704	\$5,050	\$3,500	-3%	-23%	8%	0%
		DS3	\$4,670	\$3,500	\$4,552	\$2,704	\$5,030	\$3,300	-570	-2.3 /4	070	078
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		1LEC		Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
		1				OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
D - 110 11-	South Carolina	1	(5/1/01)	(5/1/01)	Tariff	UPP	Idilli	OFF I	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
BellSouth	Caronna	DS1	\$300	\$252	\$336	\$248	\$336	\$252	12%	-2%	12%	0%
		DS3	\$4,670	\$3,500	\$4,552	\$2,704	\$5,050	\$3,500		-23%	8%	0%
		<u></u>	1	1	\$7,JJ2	42,104	40,000	40,500				
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
				Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
		1	1, 10 1,100 1,00	1		000	~	000	Price Can	Price Can	Pricing Flex	Pricing Flex

OPP

\$248

\$2,704

Tariff

\$336

\$5,050

OPP

\$252

\$3,500

Tariff

\$336

\$4,552

(5/1/01)

\$300

\$4,670

DS1

DS3

BellSouth Mississippi

(5/1/01)

\$252

\$3,500

Pricing Flex

to Pre-Pr Fl

12%

8%

Price Cap

to Pre-Pr Fl

-2%

-23%

Price Cap

to Pre-Pr Fl

12%

-3%

Pricing Flex

to Pre-Pr Fl

0%

0%

0	Ctata		Compani	SOLI OF COSCS (O	Title Startation	ic circuit) itate	S III Elligge on s				<del></del>	
Company	State	ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		ILEC	Pre-Price Flex		Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			1 '	1	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
BellSouth	Louisiana		(5/1/01)	(5/1/01)	Idilli	OFF	Tariii	0,1	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
Deligoatii	Edulatio	DS1	\$300	\$252	\$336	\$248	\$336	\$252	12%	-2%	12%	09
		DS3	\$4,670		\$4,552	\$2,704	\$5,050	\$3,500	-3%	-23%	8%	09
		200	1 .7	<u> </u>								
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
BellSouth	Tennessee		(5/1/01/	(3, 1, 01)		-,,			to Pre-Pr Fl	to Pre-Pr Fi	to Pre-Pr Fl	to Pre-Pr Fl
50004		DS1	\$300	\$252	\$336	\$248	\$336	\$252	12%	-2%	12%	0%
		DS3	\$4,670	\$3,500	\$4,552	\$2,704	\$5,050	\$3,500	-3%	-23%	8%	0%
	'											
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
	!		Dro-Brice Flex	Dra-Drice Fley	Price Can	Price Can	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference

BeilSouth Kentucky

v		Pre-Price Flex (5/1/01)	Pre-Price Flex (5/1/01)	Price Cap Tariff	Price Cap OPP	Pricing Flex Tariff	OPP	Price Cap to Pre-Pr Fl	Price Cap to Pre-Pr Fl	Pricing Flex to Pre-Pr Fi	Pricing Flex to Pre-Pr Fl	
_	DS1	\$300	\$252	\$336	\$248	\$336	\$252	12%		12%		
	DS3	\$4,670	\$3,500	\$4,552	\$2,704	\$5,050	<b>\$</b> 3,500	-3%	-23%	8%]	0%	
	·											

- 1 DS3 assumed POP channel term and the end-user channel term are between 1/2 and 1 mile of their LEC serving wire centers.
- 2 DS1 used 24-month OPPs. DS3 used 37-month.
- 4 DS3: Assumed a 1-mile end-user and POP channel term.
- 5 Did not include the TSP Optional Payment Plan that requires a committed level of total access. This plan's discounts apply to Price Cap and Pricing Flexibility rates.
- 6 Did not include Pricing Flexibility contracts that require a committed level of access expense.

Comparison of costs (0-mile Standalone	Circuit\ Dates in Effect on Aug	ruct 31 2004 to Pates in	Effect on May 1, 2001
Comparison of costs (U-mile Standalone	E IPCUITE RATES IN EITECL ON AUG	JUST 31. ZUU4 LU RALES III	Ellect on riay 1, 2001

Company	State		Comparis	SOFT OF COSES [ U-	Jille Standalor	ie Circuit) Kati	es iii cilect on	August 31, 20	104 to Nates III	Linear on may	1/2001	
Company	Julio	ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price Flex		Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
Qwest	Arizona		(3/1/01)	(5,1,01)	13	<b>.</b>			to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr FI
		DS1	\$230	\$210	\$225	\$205	\$330	\$260	-2%	-2%	43%	24%
		DS3	\$3,000	\$2,570	\$2,800	\$2,399	\$4,400	\$3,400	-7%	-7%	47%	32%
									· · · · · · · · · · · · · · · · · · ·	a: T		000.0/
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex to Pre-Pr Fl
Qwest	Colorado		****	6010	6225	#20 <i>5</i>	#220	\$260	to Pre-Pr Fl -2%	to Pre-Pr FI -2%	to Pre-Pr FI 43%	24%
		DS1	\$230	\$210	\$225	\$205	\$330	\$200 \$3,400	-2% -7%	-270 -7%	4376	32%
		DS3	\$3,000	\$2,570	\$2,800	\$2,399	\$4,400	\$3,400	-/70	-170	4776	3276
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price Flex		Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
Qwest	lowa		(3/1/01)	(3/1/01)	191111	0,,	10/111	0.,	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fi
Girosa	10114	DS1	\$230	\$210	\$225	\$205	\$330	\$260	-2%	-2%	43%	24%
		DS3	\$3,000	\$2,570	\$2,800	\$2,399	\$4,400	\$3,400	-7%	-7%	47%	32%
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
Qwest	Idaho				55.10		#2.50	\$280	to Pre-Pr FI	to Pre-Pr Fl -4%	to Pre-Pr Fl 40%	to Pre-Pr FI 22%
		DS1	\$250	\$230	\$240	\$221	\$350 \$4,400	\$280 \$3,400	-4% -7%	-4% -7%	47%	32%
		DS3	\$3,000	\$2,570	\$2,800	\$2,399	34,400	\$3,400	-770	-//6	47.70	3270
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		1	Pre-Price Flex		Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
Qwest	Minnesota		(3,1,01)	(5, 2, 62)	1 4 1 1 1	• • •			to Pre-Pr Fl	to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr Fl
		DS1	\$230	\$210	\$225	\$205	\$330				43%	24%
		DS3	\$3,000	\$2,570	\$2,800	\$2,399	\$4,400	\$3,400	-7%	-7%	47%	32%
			T 27			71.50	71.50	ILEC	Man An Man O/	OPP %	Mo-to-Mo %	OPP %
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC		Mo-to-Mo % Difference	Difference	Difference	Difference
		1		Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
Qwest	Montana	DS1	\$250	\$230	\$240	\$221	\$350	\$280		-4%	40%	22%
		DS1	\$3,000		\$2,800	\$2,399	\$4,400				47%	
		<u>US3</u>	\$3,000	\$2,570	\$2,800[	الراكيك	47,700	45,700	1			
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		<del></del>		Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
	North		(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
Qwest	Dakota			(-, -, )					to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr FI
		DS1	\$250		\$240	\$221	\$350			-4%	40%	22%
		DS3	\$3,000	\$2,570	\$2,800	\$2,399	\$4,400	\$3,400	-7%	-7%	47%	32%

001 1001	Difference Pricing Flex to Pre-Pr Fi % 24% % 32%  OPP % Difference
Qwest         Nebraska         (5/1/01)         (5/1/01)         Tariff         OPP         Tariff         OPP         Price Cap to Pre-Pr to	Pricing Flex to Pre-Pr Fi 24% 32% OPP % Difference
Qwest         Nebraska         (3/1/37) <t< td=""><td>to Pre-Pr Fi 24% 32% OPP % Difference</td></t<>	to Pre-Pr Fi 24% 32% OPP % Difference
Qwest         Nebraska         to Pre-Pr FI	24% 32% OPP % Difference
DS3         \$3,000         \$2,570         \$2,800         \$2,399         \$4,400         \$3,400         -7%         -7%           ILEC         ILEC Tariff         ILEC OPP         ILEC         ILEC         ILEC         ILEC         Mo-to-Mo	OPP % Difference
ILEC         ILEC OPP         ILEC         ILEC         ILEC         ILEC         Mo-to-Mo         OPP %         Mo-to-Mo	OPP % Difference
ALLO   ALLo   Allo   Al	Difference
ALLO   ALLo   Allo   Al	Difference
The blue Hexibite block the significant but the significant for the significant but th	
	Pricing Flex to Pre-Pr Fl
	% 24%
7.7.	% 32%
DS3 53,000 52,570 52,500 52,579 \$4,400 55,400 -776 -776	70 3270
ILEC ILEC TAIN ILEC OPP ILEC ILEC ILEC ILEC Mo-to-Mo OPP Mo-to-Mo	OPP %
Pre-Price Flex Price Flex Price Cap Price Cap Pricing Flex Pricing Flex Difference Difference Difference	Difference
(5/1/01) (5/1/01) Tariff OPP Tariff OPP Price Cap Price Cap Pricing Fle	Pricing Flex
Owest Oregon to Pre-Pr FI to Pre-Pr FI to Pre-Pr	to Pre-Pr FI
001 121 121	% 24%
DS3 \$3,000 \$2,570 \$2,800 \$2,399 \$4,400 \$3,400 -7% -7%	% 32%
	7 000 0/
ILEC Tariff ILEC OPP ILEC ILEC ILEC ILEC Mo-to-Mo % OPP % Mo-to-Mo	
Pre-Price Flex Pre-Price Flex Price Cap Price Cap Pricing Flex Pricing Flex Difference Difference Difference Difference	Difference
South (5/1/01) (5/1/01) Tariff OPP Tariff OPP Price Cap Price Cap Pricing Fle	Pricing Flex
Qwest         Dakota         to Pre-Pr FI	to Pre-Pr Fl 22%
551 (22.4)	% 32%
DS3         \$3,000         \$2,570         \$2,800         \$2,399         \$4,400         \$3,400         -7%         -7%	70 3270
ILEC ILEC TARIFF ILEC OPP ILEC ILEC ILEC ILEC Mo-to-Mo % OPP % Mo-to-Mo	OPP %
Pre-Price Flex Pre-Price Flex Price Cap Price Cap Pricing Flex Pricing Flex Difference Difference Difference	Difference
(5/1/01) (5/1/01) Tariff OPP Tariff OPP Price Cap Price Cap Pricing Flo	Pricing Flex
Qwest Utah to Pre-Pr Fl to Pre-Pr Fl to Pre-Pr	to Pre-Pr FI
501	% 24%
DS3 \$3,000 \$2,570 \$2,800 \$2,399 \$4,400 \$3,400 -7% -7%	% 32%
ILEC   ILEC Tarriff   ILEC OPP   ILEC   ILEC   ILEC   Mo-to-Mo %   OPP %   Mo-to-Mo	OPP %
1220 1220 1220 1220 1220 1220 1220 1220	Difference
The state the state the cap the cap the cap the state th	Pricing Flex
Washingto (5/1/01) (5/1/01) Tariff OPP Tariff OPP Price Cap Price Cap Pricing Flor Qwest n to Pre-Pr Flor to Pre-Pr	to Pre-Pr Fl
	% 24%
	% 32%
D33 4.5000 42,570 42,570 42,570 47,5700 779 779	749 22.0
ILEC ILEC TARRIFF ILEC OPP ILEC ILEC ILEC Mo-to-Mo W OPP W Mo-to-Mo	OPP %
Pre-Price Flex Pre-Price Flex Price Cap Price Cap Pricing Flex Pricing Flex Difference Difference Difference	Difference
(5/1/01) (5/1/01) Tariff OPP Tariff OPP Price Cap Price Cap Pricing Flo	Pricing Flex
Qwest Wyoming to Pre-Pr FI to Pre-Pr FI to Pre-Pr	to Pre-Pr Fl
USI 42.0 42.0 42.0 42.0 42.0 42.0 42.0 42.0	% 22%
DS3 \$3,000 \$2,570 \$2,800 \$2,399 \$4,400 \$3,400 -7% -7%	% 32%

		<u>Comparis</u>	on of costs (0-	<u>mile Standalon</u>	<u>e Circuit) Rate</u>	es in Effect on a	<u>August 31, 200</u>	4 to Rates in E	<u>пест on May 1</u>	, 2001	
Company State	TLEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
	<u>ILEC</u>	Pre-Price Flex		Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
		t 1			OPP OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
SBC:Ameritech Illinois		(5/1/01)	(5/1/01)	Tariff	OPP	101111	OFF	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
SBC.American minors	DS1	\$510	\$206	\$500	\$204	<b>\$</b> 510	\$206	-2%	-1%	0%	0%
ŀ	DS3	\$6,240	\$2,400	\$6,200	\$2,100	\$6,400	\$2,400	-1%	-13%	3%	0%
L	- 535	40,2.0	<del></del>								
Γ	ILEÇ	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
İ	<del></del>	Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
		(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
SBC:Ameritech Indiana		(3,2,32)	(0, -, 0-)					to Pre-Pr Fl	to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr Fl
	DS1	\$552	\$226	\$540	\$226	\$552	\$226	-2%	0%	0%	0%
<b>[</b>	DS3	\$6,420	\$2,480	\$6,400	\$2,180	\$6,600	\$2,480	0%	-12%	3%	0%
_											000.00
	<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
		(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
SBC:Ameritech Michigan		1,1,1,1						to Pre-Pr Fl	to Pre-Pr FI	to Pre-Pr FI	to Pre-Pr Fl
	DS1	\$534		\$530	\$216	\$534	\$216	-1%	0%	0%	0%
	DS3	<b>\$</b> 6,360	\$2,460	\$6,300	\$2,160	\$6,500	\$2,460	-1%	-12%	2%	0%
-								M- +- M- 0/ I	OPP %	Mo-to-Mo %	OPP %
	<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %		Difference	Difference
		Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference		Pricing Flex
Ì		(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	to Pre-Pr Fl
SBC:Ameritech Ohio							#216	to Pre-Pr Fl	to Pre-Pr FI	to Pre-Pr Fl 0%	0%
	DS1	\$534	\$216	\$530	\$216	\$534		-1%	0%	2%	0%
l	DS3	\$6,360	\$2,460	\$6,300	\$2,160	\$6,500	\$2,460	-1%	-12%	270	U 70
,		T	· T		71.50	11.50	TI TI EC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
	<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Difference	Difference	Difference	Difference
			Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex
<u> </u>		(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
SBC:Ameritech Wisconsin			622.6	0540	6226	\$552	\$226	-2%	0%	0%	09
	DS1	\$552		\$540	\$226			0%	-12%		
	DS3	\$6,420	\$2,480	\$6,400	\$2,180	<b>\$</b> 6,600	\$2,480	070	-12/0	370	V.

<sup>1</sup> Fixed mileage rates in the tariff were doubled as they are in ABC: Ameritech's billing.

<sup>2</sup> Did not include the MVP Optional Payment Plan that requires a committed level of total access. This plan's discounts apply to Price Cap and Pricing Flexibility rates.

Company

State

SBC: Pac Bell California

ILE	Pre-	EC Tariff Price Flex 5/1/01)	ILEC OPP Pre-Price Flex (5/1/01)	ILEC Price Cap Tariff	ILEC Price Cap OPP	ILEC Pricing Flex Tariff	ILEC Pricing Flex OPP	Mo-to-Mo % Difference Price Cap to Pre-Pr Fl	OPP % Difference Price Cap to Pre-Pr Fl	Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl	OPP % Difference Pricing Flex to Pre-Pr Fl
DS	1	\$260	\$210	\$251	\$235	\$305	\$225	-4%	12%		
DS		\$5,000	\$2,290	\$4,400	\$1,700	\$5,000	\$2,290	-12%	-26%	0%	0%

<sup>1</sup> Did not include the MVP Optional Payment Plan that requires a committed level of total access. This plan's discounts apply to Price Cap and Pricing Flexibility rates.

1

<sup>2</sup> Did not include the DVP Optional Payment Plan that requires a committed level of total DS1 access. This plan's discounts apply to Price Cap and Pricing Flexibility rates.

Company	State		сопраня	son or costs (u-	inne Standardi	ie Circuit) Kate	S III EIIEGE OII 2	<u> </u>	14 to Nates III E	HEEL OH HAY I	, 2001	
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
SBC:SWBT	Arkansas		(5, 2, 52)	(0, 2, 02)	, =,				to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
	[	DS1	\$360	\$230	\$362	\$224	\$430	\$224	1%	-3%	19%	-3%
	[	DS3	\$3,900	\$2,500	\$3,800	\$2,300	\$3,900	\$2,500	-3%	-8%	0%	0%
	,		T		<del></del> _				M - t - M - 0/ 3	000 0/	Ma to Ma N/	OPP %
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP % Difference	Mo-to-Mo % Difference	Difference
			Pre-Price Flex		Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference		Pricing Flex	Pricing Flex
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	- ;	to Pre-Pr Fl
SBC:SWBT	Kansas		#1(0	#220	#2/2	\$224	\$430	\$224	to Pre-Pr FI 1%	to Pre-Pr FI -3%	to Pre-Pr FI	-3%
		DS1	\$360	\$230	\$362	\$2,300	\$430 \$3,900	\$2,500	-3%	-3%	0%	0%
	Į	DS3	\$3,900	\$2,500	\$3,800	52,300	\$3,900	\$2,300	-376	-070]	U701	0 70
	1	ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price Flex		Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
SBC:SWBT	Missouri		(3/1/01)	(3/1/01)	10	Ŭ. I			to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
	į	DS1	\$360	<b>\$</b> 230	\$362	\$224	\$430	S224	1%	-3%	19%	-3%
	ì	DS3	\$3,900	\$2,500	\$3,800	\$2,300	\$3,900	\$2,500	-3%	-8%	0%	0%
												000.0
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
			Pre-Price Flex	Pre-Price Flex	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
SBC:SWBT	Oklahoma					- 600 4	# 420	#22.4	to Pre-Pr Fl	to Pre-Pr Fl -3%	to Pre-Pr Fl 19%	to Pre-Pr Fl -3%
		DS1	\$360	\$230	\$362	\$224	\$430	\$224	1% -3%	-3% -8%	19%	-3% 0%
		DS3	\$3,900	\$2,500	\$3,800	\$2,300	\$3,900	\$2,500	-3%6	-676	070	U70
	!	ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
		<del></del>		Pre-Price Flex	Price Cap	Price Cap	Pricina Flex	Pricing Flex	Difference	Difference	Difference	Difference
			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
SBC:SWBT	Texas		(3, 1, 01)	(3, 1, 01)	, 31111	5.,	, <b></b>	•	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
		DS1	\$360	\$230	\$362	\$224	\$430	\$224	1%	-3%	19%	-3%
		DS3	\$3,900	\$2,500	\$3,800	\$2,300	\$3,900	\$2,500	-3%	-8%	0%	0%
	1		. , , , , ,	·		······						

<sup>1</sup> Did not include the MVP Optional Payment Plan that requires a committed level of total access. This plan's discounts apply to Price Cap and Pricing Flexibility rates.

Company	State		Comparis	•••								
Company	[	ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
Verizon:			Pre-Price Flex		Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
Bell Atlantic-			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
North	Maine		(5/1/01)	(0, 2, 02)	1=				to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr FI	to Pre-Pr FI
		DS1	\$533	\$373	\$463	\$347	\$586	<b>\$4</b> 40	-13%	-7%	10%	18%
		DS3	\$3,081	\$2,773	\$2,900	\$2,610	\$3,389	\$2,773	-6%	-6%	10%	0%
									7	000.00		OPP %
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	Difference
Verizon:			Pre-Price Flex		Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference Pricing Flex	Pricing Flex
Bell Atlantic-	New		(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap to Pre-Pr Fl	to Pre-Pr Fi	to Pre-Pr Fl
North	Hampshire	504	#c22	6202	6462	\$347	\$586	\$440	to Pre-Pr Fl -13%	-7%	10%	18%
		DS1	\$533	\$373 \$2,773	\$463 \$2,900	\$2,610	\$3,389	\$2,773	-6%	-6%	10%	0%
		DS3	\$3,081	\$2,773	32,900	\$2,010	\$3,369		-070]	-070	1070	070
		ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
Verizon:			Pre-Price Flex		Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
Bell Atlantic-			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
North	Vermont		(3, 2, 32)	(0, 2, 02)	1			-	to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr Fi	to Pre-Pr Fl
		DS1	\$533	\$373	\$463	\$347	\$586	<b>\$4</b> 40	-13%	-7%	10%	18%
		DS3	\$3,081	\$2,773	\$2,900	\$2,610	\$3,389	\$2,773	-6%	-6%	10%	0%
										000 0/	44-1-14-0/	CPP 0/
		<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
Verizon:			Pre-Price Flex		Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
Bell Atlantic-			(5/1/01)	(5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex to Pre-Pr Fl
North												to Pre-Pr Fr
NOLLII	Massachusetts			t200	6204	#20 <i>C</i>	6451	#22B	to Pre-Pr Fl	to Pre-Pr FI	to Pre-Pr Fl	10/
North	Massachusetts	DS1	\$410		\$394	\$296	\$451	\$338 \$2,521	-4%	-10%	10%	3%
NOLLII	Massachusetts	DS1 DS3			\$394 \$2,636	\$296 \$2,372	\$451 \$3,081	\$338 \$2,521				3% 0%
Mortin	Massachusetts	DS3	\$410 \$2,801	\$2,521					-4%	-10%	10%	
	Massachusetts		\$410 \$2,801	\$2,521 ILEC OPP	\$2,636 ILEC	\$2,372 ILEC	\$3,081 ILEC	\$2,521 ILEC	-4% -6%	-10% -6%	10% 10%	0%
Verizon;	Massachusetts	DS3	\$410 \$2,801 ILEC Tariff Pre-Price Flex	\$2,521 ILEC OPP Pre-Price Flex	S2,636  ILEC Price Cap	\$2,372	\$3,081	\$2,521	-4% -6% Mo-to-Mo %	-10% -6% OPP %	10% 10% Mo-to-Mo % Difference Pricing Flex	0% OPP % Difference Pricing Flex
	Massachusetts  Rhode Island	DS3	\$410 \$2,801	\$2,521 ILEC OPP	\$2,636 ILEC	\$2,372 ILEC Price Cap OPP	\$3,081 ILEC Pricing Flex	\$2,521 ILEC Pricing Flex OPP	-4% -6% Mo-to-Mo % Difference Price Cap to Pre-Pr FI	-10% -6% OPP % Difference Price Cap to Pre-Pr Fl	10% 10% Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl	OPP % Difference Pricing Flex to Pre-Pr Fl
Verizon: Bell Atlantic-		DS3	\$410 \$2,801 ILEC Tariff Pre-Price Flex	\$2,521 ILEC OPP Pre-Price Flex	S2,636  ILEC Price Cap Tariff \$463	\$2,372 ILEC Price Cap OPP	\$3,081  ILEC  Pricing Flex  Tariff  \$586	\$2,521 ILEC Pricing Flex OPP	-4% -6% Mo-to-Mo % Difference Price Cap to Pre-Pr FI -13%	-10% -6% OPP % Difference Price Cap to Pre-Pr Fl -7%	10% 10% Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl	OPP % Difference Pricing Flex to Pre-Pr Fl 18%
Verizon: Bell Atlantic-		DS3 ILEC	\$410 \$2,801 ILEC Tariff Pre-Price Flex (5/1/01)	\$2,521 ILEC OPP Pre-Price Flex (5/1/01) \$373	S2,636  ILEC  Price Cap  Tariff	\$2,372 ILEC Price Cap OPP	\$3,081 ILEC Pricing Flex Tariff	\$2,521 ILEC Pricing Flex OPP	-4% -6% Mo-to-Mo % Difference Price Cap to Pre-Pr FI	-10% -6% OPP % Difference Price Cap to Pre-Pr Fl	10% 10% Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl	OPP % Difference Pricing Flex to Pre-Pr Fl
Verizon: Bell Atlantic-		DS3 ILEC  DS1 DS3	\$410 \$2,801 ILEC Tariff Pre-Price Flex (5/1/01) \$533 \$3,081	\$2,521 ILEC OPP Pre-Price Flex (5/1/01) \$373 \$2,773	S2,636  ILEC Price Cap Tariff \$463 \$2,900	\$2,372 ILEC Price Cap OPP \$347 \$2,610	\$3,081 ILEC Pricing Flex Tariff \$586 \$3,389	\$2,521 ILEC Pricing Flex OPP \$440 \$2,773	-4% -6% Mo-to-Mo % Difference Price Cap to Pre-Pr FI -13% -6%	-10% -6%  OPP % Difference Price Cap to Pre-Pr Fl -7% -6%	10% 10% Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl 10%	OPP % Difference Pricing Flex to Pre-Pr Fl 18% 0%
Verizon: Bell Atlantic-		DS3 ILEC DS1	\$410 \$2,801 ILEC Tariff Pre-Price Flex (5/1/01) \$533 \$3,081 ILEC Tariff	\$2,521 ILEC OPP Pre-Price Flex (5/1/01) \$373 \$2,773 ILEC OPP	S2,636  ILEC Price Cap Tariff \$463 \$2,900  ILEC	\$2,372 ILEC Price Cap OPP \$347 \$2,610	\$3,081  ILEC Pricing Flex Tariff  \$586 \$3,389  ILEC	\$2,521  ILEC Pricing Flex OPP  \$440 \$2,773  ILEC	-4% -6%  Mo-to-Mo % Difference Price Cap to Pre-Pr FI -13% -6%  Mo-to-Mo %	-10% -6%  OPP %  Difference Price Cap to Pre-Pr Fl -7% -6%  OPP %	10% 10% Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl 10% 10% Mo-to-Mo %	OPP % Difference Pricing Flex to Pre-Pr Fl 18% 0%
Verizon: Bell Atlantic-		DS3 ILEC  DS1 DS3	\$410 \$2,801 ILEC Tariff Pre-Price Flex (5/1/01) \$533 \$3,081 ILEC Tariff Pre-Price Flex	\$2,521  ILEC OPP Pre-Price Flex (5/1/01)  \$373 \$2,773  ILEC OPP Pre-Price Flex	S2,636  ILEC Price Cap Tariff \$463 \$2,900  ILEC Price Cap	\$2,372  ILEC Price Cap OPP  \$347 \$2,610  ILEC Price Cap	\$3,081  ILEC Pricing Flex Tariff  \$586 \$3,389  ILEC Pricing Flex	\$2,521  ILEC Pricing Flex OPP  \$440 \$2,773  ILEC Pricing Flex	-4% -6%  Mo-to-Mo % Difference Price Cap to Pre-Pr FI -13% -6%  Mo-to-Mo % Difference	-10% -6%  OPP %  Difference Price Cap to Pre-Pr Fl -7% -6%  OPP %  Difference	10% 10% Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl 10% 10% Mo-to-Mo % Difference	OPP % Difference Pricing Flex to Pre-Pr Fl 18% 0% OPP % Difference
Verizon: Bell Atlantic- North Verizon: Bell Atlantic-	Rhode Island	DS3 ILEC  DS1 DS3	\$410 \$2,801 ILEC Tariff Pre-Price Flex (5/1/01) \$533 \$3,081 ILEC Tariff	\$2,521 ILEC OPP Pre-Price Flex (5/1/01) \$373 \$2,773 ILEC OPP	S2,636  ILEC Price Cap Tariff \$463 \$2,900  ILEC	\$2,372 ILEC Price Cap OPP \$347 \$2,610	\$3,081  ILEC Pricing Flex Tariff  \$586 \$3,389  ILEC	\$2,521  ILEC Pricing Flex OPP  \$440 \$2,773  ILEC	-4% -6%  Mo-to-Mo % Difference Price Cap to Pre-Pr F1 -13% -6%  Mo-to-Mo % Difference Price Cap	-10% -6%  OPP % Difference Price Cap to Pre-Pr Fl -7% -6%  OPP % Difference Price Cap	10% 10% Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl 10% 10% Mo-to-Mo % Difference Pricing Flex	OPP % Difference Pricing Flex to Pre-Pr Fl 18% 0% OPP % Difference Pricing Flex
Verizon: Bell Atlantic- North Verizon:		DS3  ILEC  DS1 DS3  ILEC	\$410 \$2,801 ILEC Tariff Pre-Price Flex (5/1/01) \$533 \$3,081 ILEC Tariff Pre-Price Flex (5/1/01)	\$2,521  ILEC OPP Pre-Price Flex (5/1/01)  \$373 \$2,773  ILEC OPP Pre-Price Flex (5/1/01)	S2,636  ILEC Price Cap Tariff  \$463 \$2,900  ILEC Price Cap Tariff	\$2,372  ILEC Price Cap OPP  \$347 \$2,610  ILEC Price Cap OPP	\$3,081  ILEC Pricing Flex Tariff  \$586 \$3,389  ILEC Pricing Flex Tariff	\$2,521  ILEC Pricing Flex OPP  \$440 \$2,773  ILEC Pricing Flex OPP	-4% -6%  Mo-to-Mo % Difference Price Cap to Pre-Pr FI -13% -6%  Mo-to-Mo % Difference Price Cap to Pre-Pr FI	-10% -6%  OPP %  Difference Price Cap to Pre-Pr Fl -7% -6%  OPP %  Difference Price Cap to Pre-Pr F1	10% 10% Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl 10% 10%  Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl	OPP % Difference Pricing Flex to Pre-Pr Fl 18% 0% OPP % Difference Pricing Flex to Pre-Pr Fl
Verizon: Bell Atlantic- North Verizon: Bell Atlantic-	Rhode Island	DS3 ILEC  DS1 DS3 ILEC  DS1	\$410 \$2,801 ILEC Tariff Pre-Price Flex (5/1/01) \$533 \$3,081 ILEC Tariff Pre-Price Flex (5/1/01)	\$2,521  ILEC OPP Pre-Price Flex (5/1/01)  \$373 \$2,773  ILEC OPP Pre-Price Flex (5/1/01)  \$282	S2,636  ILEC Price Cap Tariff  \$463 \$2,900  ILEC Price Cap Tariff  \$354	\$2,372  ILEC Price Cap OPP  \$347 \$2,610  ILEC Price Cap OPP	\$3,081  ILEC Pricing Flex Tariff  \$586 \$3,389  ILEC Pricing Flex Tariff  \$388	\$2,521  ILEC Pricing Flex OPP  \$440 \$2,773  ILEC Pricing Flex OPP  \$291	-4% -6%  Mo-to-Mo % Difference Price Cap to Pre-Pr FI -13% -6%  Mo-to-Mo % Difference Price Cap to Pre-Pr FI	-10% -6%  OPP %  Difference Price Cap to Pre-Pr FI -7% -6%  OPP %  Difference Price Cap to Pre-Pr F1 -6%	Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl 10%  Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl 10%	OPP % Difference Pricing Flex to Pre-Pr Fl 18% 0% OPP % Difference Pricing Flex to Pre-Pr Fl 3%
Verizon: Bell Atlantic- North Verizon: Bell Atlantic-	Rhode Island	DS3  ILEC  DS1 DS3  ILEC	\$410 \$2,801 ILEC Tariff Pre-Price Flex (5/1/01) \$533 \$3,081 ILEC Tariff Pre-Price Flex (5/1/01)	\$2,521  ILEC OPP Pre-Price Flex (5/1/01)  \$373 \$2,773  ILEC OPP Pre-Price Flex (5/1/01)	S2,636  ILEC Price Cap Tariff  \$463 \$2,900  ILEC Price Cap Tariff	\$2,372  ILEC Price Cap OPP  \$347 \$2,610  ILEC Price Cap OPP	\$3,081  ILEC Pricing Flex Tariff  \$586 \$3,389  ILEC Pricing Flex Tariff	\$2,521  ILEC Pricing Flex OPP  \$440 \$2,773  ILEC Pricing Flex OPP	-4% -6%  Mo-to-Mo % Difference Price Cap to Pre-Pr FI -13% -6%  Mo-to-Mo % Difference Price Cap to Pre-Pr FI	-10% -6%  OPP %  Difference Price Cap to Pre-Pr Fl -7% -6%  OPP %  Difference Price Cap to Pre-Pr F1	10% 10% Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl 10% 10%  Mo-to-Mo % Difference Pricing Flex to Pre-Pr Fl	OPP % Difference Pricing Flex to Pre-Pr Fl 18% 0% OPP % Difference Pricing Flex to Pre-Pr Fl

<sup>1</sup> DS3 POP Channel Terms are priced based on the number of DS3 channels, both channel terms and entrance facilities, from the specific LEC LSO to the specific customer designated premises. Used count of 25+ (AT&T's modal value, near the lowest value) for the POP channel term rate. The end-user rate is a secondary channel term rate.

<sup>2</sup> Did not include Pricing Flexibility contracts that require a committed level of access expense.

Comparis	son of costs (U	-mile Standald	ne Circuit) Ra	tes in Effect or	1 August 31, 20	004 to Rates in	Effect on May	1, 2001
EC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo
no Deino I	Dun Deise	Duine Con	Duine Com	Oninina Class	Duining Flore	Difference	Difference	Differen

				T =1 == 105		-:							
Percent   Perc			<u>ILEC</u>	ILEC Tariff	ILEC OPP	ILEC	ILEC	ILEC	ILEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
Delaware   Delaware	Verizon:			Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
Delaware   Delaware	Bell Atlantic-			Flex (5/1/01)	Flex (5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
DS1   Still	South	Delaware		(-, -, -,					•	to Pre-Pr FI	to Pre-Pr FI	to Pre-Pr FI	to Pre-Pr F1
Vestron: Bel Allanic-South   New Jersey   DS3   \$3,998   \$3,599   \$2,036   \$2,372   \$4,192   \$3,372   \$3,490   \$3,590   \$1,096   \$0,000			DS1	S418	<b>\$</b> 353	\$394	\$296	\$451	\$338	-6%	-16%	8%	
Per-Price   Price Cap				33,333		\$2,050	94,574	. 47,072	Ψ0,5 ε Δ	-3474	-3470	10/10	-076
Per-Price   Price Cap			UEC	TLEC Tariff	THEC CODE	TLEC	TIEC	TLEC	TIEC	Mo-to-Mo 04	ODD 9/4	Mo-to-Mo 9/-	AP 94
Personation   New Jersey   South   New Jersey   South   New Jersey   OS1			ILLU										
DS1   Si18   Si35   Si30   S								-					
DS1   S418   S353   S204   S2,372   S4,392   S3,372   S346   S338   -6%   -16%   S94   S95   S				Flex (5/1/01)	Flex (5/1/01)	Tariff	OPP	Tariff	OPP				
DS3   \$3,993   \$3,593   \$2,636   \$2,372   \$4,392   \$3,372   \$-34%   \$-34%   \$-10%   \$-6%	South	New Jersey											
Price Price   Price Cap   Pr			DS3	\$3,993	\$3,593	\$2,636	\$2,372	<b>\$</b> 4,392	\$3,372	-34%	-34%	10%	-6%
Price Price   Price Cap   Pr		1											
Pennsylvania			<u>ILEC</u>	ILEC Tariff	ILEC OPP		ILEC		ILEC				
Pennsylvania	Verizon:			Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex	Difference	Difference	Difference	Difference
Pennsylvania   Penn	Bell Atlantic-			Flex (5/1/01)	Flex (5/1/01)	Tariff	OPP		OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
DS1   S418   S333   S394   S296   S451   S338   -6%   -16%   8%   -4%	South	Pennsylvania		(-, -, -, -,			• • •	,		to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr Fl	to Pre-Pr Fl
DS3   S3,993   S2,636   S2,372   S4,392   S3,72   -34%   -34%   10%   -6%		•	DS1	\$418	\$353	\$394	\$296	\$451	\$338	-6%	-16%		-4%
Verizon: Bell Adandic-South   Virginia   Verizon: Bell Adandic-South   Virginia   DCS1   S418   S353   S3.994   S2.96   S451   S338   -6%   -16%   S%   -4				\$3 993	\$3,593	\$2,636							
Pre-Price   Pre-Price   Price Cap   Price Cap   Pricing Flex   Pricing Flex   Pricing Flex   Pricing Flex   Pricing Flex   Price Cap   P				40,530	\$3,370	\$2,000		Ψ1,072	45,512	3478	2470	1070	070
Pre-Price   Pre-Price   Price Cap   Price Cap   Pricing Flex   Pricing Flex   Pricing Flex   Pricing Flex   Pricing Flex   Price Cap   P			UEC	ILEC Tariff	THEC OPP	TLEC	TLEC	TLEC	TLEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
Flex (5/1/01)   Flex (5/1/01)   Tariff   OPP   Tariff   OPP   Tariff   OPP   Tariff   OPP   OP			****										
DS1   S418   S353   S394   S296   S451   S338   G96   G97   G98								-	-			l l	
DS1   \$418   \$353   \$394   \$296   \$451   \$338   -6%   -16%   8%   -4%		Mandand		Fiex (5/1/01)	Flex (5/1/01)	Tariff	OPP	lariff	OPP				
DS3   \$3,993   \$3,593   \$2,636   \$2,372   \$4,392   \$3,372   \$-34%   \$-34%   \$10%   \$-6%	South	Maryland	224		42.43								
Verizon: Bell Atlantic-South   Virginia   Verizon: Bell Atlantic-South   Verizon: Bell Atla													
Pre-Price   Pre-Price   Pre-Price   Pre-Price   Price   Pric			DS3	\$3,993	\$3,593	\$2,636	\$2,372	\$4,392	\$3,372	-34%	-34%	10%	-6%
Pre-Price   Pre-Price   Pre-Price   Pre-Price   Price   Pric				T		<del>-</del>						···	
Flex (5/1/01)   Flex (5/1/01)   Tariff   OPP   Tariff   OPP   Tariff   OPP   Tariff   OPP   Price Cap to Pre-Pr Fl to Pr			<u>ILEC</u>										
Verizon: Bell Atlantic-South   Verizon: Bell Atlantic-South	Verizon:			Pre-Price	Pre-Price	Price Cap	Price Cap	Pricing Flex	Pricing Flex				
DS1   S418   S353   S394   S296   S451   S338   -6%   -16%   8%   -4%	Bell Atlantic-			Flex (5/1/01)	Flex (5/1/01)	Tariff	OPP	Tariff	OPP	Price Cap	Price Cap	Pricing Flex	Pricing Flex
Verizon: Bell Atlantic-South   DC   ILEC Tarriff   ILEC OPP   ILEC   I	South	Virginia			' ' 1					to Pre-Pr FI	to Pre-Pr Fi	to Pre-Pr Fl	to Pre-Pr FI
Verizon: Bell Atlantic-South   DC   ILEC Tarriff   ILEC OPP   ILEC   ILEC   ILEC   ILEC   DPP   ILEC   DPP   Tarriff   OPP   Tarriff   OPP   Tarriff   OPP   Tarriff   OPP   Tarriff   OPP   O			DS1	\$418	\$353	\$394	\$296	\$451	\$338	-6%	-16%	8%	-4%
Verizon: Bell Atlantic-South   DC   ILEC Tariff   ILEC OPP   Pre-Price   Price Cap   Pri			DS3	\$3,993	\$3,593	\$2,636	\$2,372	\$4.392	\$3.372	-34%	-34%	10%	
Verizon:   Bell Atlantic-   South   DC   Pre-Price   Pre-Price   Flex (5/1/01)   Price Cap   Price Cap   Price Cap   Pricing Flex   OPP   Tariff   OPP   Tariff   OPP   Tariff   OPP   O		,		· · · · · · · · · · · · · · · · · · ·									
Verizon:   Bell Atlantic-   South   DC   Pre-Price   Pre-Price   Flex (5/1/01)   Price Cap   Price Cap   Price Cap   Pricing Flex   OPP   Tariff   OPP   Tariff   OPP   Tariff   OPP   O			ILEC	ILEC Tariff	ILEC OPP	ILEC	ILEC	TLEC	TLEC	Mo-to-Mo %	OPP %	Mo-to-Mo %	OPP %
Flex (5/1/01)   Flex (5/1/01)   Tariff   OPP   Tariff   OPP   Tariff   OPP   Price Cap to Pre-Pr FI   to Pre-Pr FI to Pr	Marizon			t									
DC													
DS1   S418   S353   S394   S296   S451   S338   G6%   G76		DC.		Liex (2/1/01)	Fiex (3/1/01)	1 ariii	OPP	Tariff	UPP				
DS3	00001	50	DC1	6410	6252	6204	6206	P451	\$220				
Verizon: Bell Atlantic- South West Virginia Verizon: Bell Atlantic- South Verizon: Bell Atlantic- South Verizon: Bell Atlantic- South Verizon: Bell Atlantic- South Verizon: Bell Atlantic- South Verizon: Bell Atlantic- South Verizon: Bell Atlantic- South Verizon: Bell Atlantic- South Verizon: Bell Atlantic- South Verizon: Bell Atlantic- South Verizon: Bell Atlantic- South Verizon: Bell Atlantic- South Verizon: Bell Atlantic- South Verizon: Pre-Price Pre-Price Price Cap Price Cap Price Cap Price Cap Pricing Flex OPP Tariff OPP Tariff OPP Tariff Size Size Size Size Size Size Size Size													
Verizon: Beli Atlantic- South West Virginia Verizon: Beli Atlantic- South Vest Virginia Vest Virginia Vest Virginia Verizon: Flex (5/1/01) Flex (5/1/01) Flex (5/1/01) Flex (5/1/01) Tariff OPP Tariff OPP Tariff OPP Tariff OPP Tariff South Tariff OPP Tariff OPP Tariff South Tariff OPP Tariff OPP Tariff OPP Tariff South To Pre-Pr Fl To Pre-Pr			<u> </u>	\$3,993	\$3,393	\$2,636	\$2,372	\$4,392	\$3,372	-34%	-34%	10%	-6%
Verizon: Beli Atlantic- South West Virginia Verizon: Beli Atlantic- South Vest Virginia Vest Virginia Vest Virginia Verizon: Flex (5/1/01) Flex (5/1/01) Flex (5/1/01) Flex (5/1/01) Tariff OPP Tariff OPP Tariff OPP Tariff OPP Tariff South Tariff OPP Tariff OPP Tariff South Tariff OPP Tariff OPP Tariff OPP Tariff South To Pre-Pr Fl To Pre-Pr		1	71.50	71 FO T. 100	T. F. C. O. D. T.	71.50	71.50		11.50		0000		000
Beli Atlantic-  South   West Virginia   Flex (5/1/01)   Flex (5/1/01)   Flex (5/1/01)   Tariff   OPP   Tariff   OPP   Price Cap   Price Cap   Pricing Flex   Pricing Flex   to Pre-Pr Fl			ILEC										
South         West Virginia         to Pre-Pr FI	Verizon:								Pricing Flex				
DS1 \$418 \$353 \$394 \$296 \$451 \$338 -6% -16% 8% -4%				Flex (5/1/01)	Flex (5/1/01)	Tariff	OPP	Tariff	OPP				
			ı	1	1 1					to Pre-Pr Fl	to Pre-Pr FI	to Pre-Pr Fl	to Pre-Pr Fl
DS3 \$3,993 \$3,593 \$2,636 \$2,372 \$4,392 \$3,372 -34% -34% 10% -6%	South	west virginia											
	South	vvest Virginia	DS1	\$418	\$353	<b>\$</b> 394	\$296	\$451	\$338	-6%	-16%	8%	-4%
	South	vvest Virginia											

<sup>1</sup> DS3 POP Channel Terms are priced based on the number of DS3 channels, both channel terms and entrance facilities, from the specific LEC LSO to the specific customer designated premises. Used count of 25+ (AT&T's modal value, near the lowest value) for the POP channel term rate. The end-user rate is a secondary channel term rate.

2 Did not include Pricing Flexibility contracts that require a committed level of access expense.

## 2001 - 2004 Annual Filings RBOC Price Cap % Below Maximum Allowable Level Special Access Basket

	2001	2002	2003	2004
Ameritech	0.00%	-0.04%	-0.13%	0.00%
Verizon-East	0.00%	0.00%	0.00%	0.00%
BellSouth	0.00%	0.00%	0.00%	-0.10%
Pac Bell	0.00%	0.00%	-0.01%	0.00%
Southwestern	0.00%	-0.01%	-0.09%	0.00%
Qwest	-0.55%	-0.45%	-0.44%	-0.51%